

UNITED STATES DISTRICT COURT

for the
Western District of Arkansas
Fort Smith Division

US DISTRICT COURT
WESTERN DIST ARKANSAS
FILED

MAR 12 2020

By **DOUGLAS F. YOUNG, Clerk**
Deputy Clerk

In the Matter of the Search of)
Premises located at)
2310 County Road 4490)
Ozone, Arkansas)

Case No. 2:20CM 27

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe property to be searched and give its location*): **Premises located at 2310 County Road 4490, Ozone, Arkansas more particularly described on Attachment "A"**,

located in the Western District of Arkansas, there is now concealed (*identify the person or describe the property to be seized*): **See Attachment "B"**.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

| <i>Code Section</i> | <i>Offense Description</i> |
|---------------------|--|
| 18 U.S.C. § 373 | Solicitation to Commit a Crime of Violence |
| 18 U.S.C. § 875(c) | Interstate Communication of a Threat |
| 18 U.S.C. § 922(g) | Prohibited Person in Possession of Firearm |
| 18 U.S.C. § 922(o) | Illegal Possession of a Machine Gun |
| 18 U.S.C. § 2332a | Conspiracy to Use a Weapon of Mass Destruction |

The application is based on these facts:

Continued on the attached sheet.

Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.



Applicant's signature

Ryan Crump, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 3/12/20



Judge's signature

City and state: Fort Smith, Arkansas

Mark E. Ford, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A SEARCH WARRANT

I, Ryan Crump, a Special Agent of the Federal Bureau of Investigation (“FBI”) being duly sworn, depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant. I have been employed with the FBI since August 2016. I am currently assigned to the FBI Little Rock Field Office, Fort Smith Resident Agency where I am tasked with conducting national security investigations. During my career as a Special Agent, I have been involved in a variety of investigative matters, including international and domestic terrorism matters. During the course of these investigations, I have assisted with Title III wire intercept affidavits, participated in the execution of search and arrest warrants, conducted physical surveillance, participated in controlled meetings with confidential sources, and communicated with other local and federal law enforcement officers regarding the manner in which those engaged in domestic terror activities conduct their business.

2. This affidavit is submitted in support of the application for a warrant to search the following premise in the Western District of Arkansas, Fort Smith Division: 2310 County Road, 4490 Ozone, Arkansas (“**THE TARGET LOCATION**”), further described in Attachment A, to include all the buildings, vehicles, curtilage and appurtenances located and attached thereto, in addition to the person of any individuals and the vehicles located thereon at the time of the execution of the warrant, for things described in Attachment B.

3. Affiant has reason to believe that evidence of violations of Title 18 U.S.C. § 373, Solicitation to Commit a Crime of Violence; Title 18 U.S.C. § 875(c), Interstate Communication of a Threat; Title 18 U.S.C. § 922(g), Prohibited Person in Possession of Firearms; Title 18 U.S.C. § 922(o), Illegal Possession of a Machine Gun; and Title 18 U.S.C. § 2332a, Use a Weapon of Mass Destruction, will be found at **THE TARGET LOCATION**.

4. The information contained in this affidavit is based upon my personal observations, as well as information provided to me by fellow law enforcement officers of the FBI, information provided by witness statements, and my experience and background. Because this affidavit is being submitted for the limited purpose of securing an application for a warrant to search, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts which I believe are necessary to establish probable cause that the residence location will contain evidence that Title 18 U.S.C. §§ 373, 875(c), 922(g), 922(o), and 2332a have been violated.

FACTS AND CIRCUMSTANCES

5. On August 31, 2019, the FBI received information regarding private chat messages of five Facebook User IDs engaged in violent rhetoric. As part of this investigation, it is believed that the five Facebook accounts were used by three individuals, Jason D’Juan **GARFIELD** a/k/a “Moon Man” a/k/a “Jugger Bugger” (User IDs: 100039745848858, 100040632669718, and 100037513098779), Travis OWENS (User ID: 100009372128338), and James WISDOM III (User ID: 100031411818671). Rhetoric in the private chat messages was consistent with racially motivated extremism ideology, to include aspirational violence against religious and racial minorities.

Prior Mistaken Identification

6. Your Affiant had previously believed and had previously advised this Court that the Facebook accounts I now know were used by **GARFIELD** were used by an individual by the name of Dalton Scott.

7. Your Affiant received information regarding three alias Facebook profiles, “Moon Man,” “Jugger Bugger,” and “Jugger Bugger.” Telephone number 479-847-4569 was associated with “Moon Man.” Telephone number 479-214-2684 was associated with one of the “Jugger Bugger” Facebook accounts. No telephone number was associated with the other “Jugger Bugger” Facebook account.

8. During the course of this investigation, the FBI had four sources of information to suggest 479-847-4569, the number associated with the “Moon Man” Facebook account, belonged to Dalton Scott.

a. “Moon Man” was identified as Dalton Scott by the complainant.

b. Telephone number 479-847-4569 was historically attributed to Dalton C. Scott by open sources searches.

c. A search for 479-847-4569 in open sources indicated it was associated with a Skype account for Dalton Scott.

d. A grand jury subpoena return for one of Dalton Scott's Facebook accounts (in true name) indicated 479-847-4569 was paired with the account in 2015.

9. The number 479-847-4569 was previously identified as a Verizon Wireless phone number. After discussion with Verizon, the FBI was informed that 479-847-4569 was actually serviced by Tracfone, and that the FBI would need to consult Tracfone for subscriber information. Tracfone subsequently advised there was no subscriber information for the number to report. As a

result, attempts to verify the subscriber of the phone through the service provider yielded no further information.

10. Verizon and Tracfone were unable to provide subscriber information for 479-214-2684, the number associated with one of the “Jugger Bugger” accounts. However, Verizon was able to provide GPS pings for this number, which were requested and obtained pursuant to emergency disclosure.

11. In addition, the FBI served a subpoena to Tracfone for telephone number 479-214-2684, the results of which revealed the following information:

- a. Name: N/A;
- b. DOB: 09/11/97;
- c. Security Pin: 1488;
- d. Email: decanusbjorn@straighttalk.com;
- e. Phone: 1351681175;
- f. Address: 1351681175, Clarksville, AR 72830; and
- g. Purchase Information: Phone was purchased at Walmart store 5360.

12. The FBI has utilized a confidential source in this investigation who will be referred throughout this Affidavit as “CS1.” CS1 has no criminal history and is motivated by patriotism. Affiant deems CS1 to be a reliable informant whose information can be trusted. CS1 did not recognize Dalton Scott as “Jugger Bugger.” CS1 was shown a photo of **GARFIELD** and recognized **GARFIELD** as “Jugger Bugger.” On or around October 25, 2019, CS1 advised agents that “Jug’s”¹ true name was Jason **GARFIELD**, and that **GARFIELD** was employed as a

¹ “Jug” is believed to be shorthand for “Jugger Bugger” a/k/a Jason **GARFIELD**.

maintenance mechanic on third shift at ConAgra in Russellville, Arkansas. On or around October 30, 2019, information provided by CS1 was corroborated by ConAgra.

13. **GARFIELD** was further identified following searches in open source law enforcement databases. **GARFIELD** was found to have a date of birth of September 11, 1997, which matched the date of birth provided in the Tracfone subpoena return for 479-214-2684. Furthermore, “1488”² is a commonly used racist slogan. The use of these four digits for a pin would be consistent with the rhetoric observed via the “Jugger Bugger” Facebook account.

Facebook Communications

14. **GARFIELD** has communicated on Facebook with other persons engaged in racially motivated, extremist rhetoric. Additionally, Your Affiant has reviewed the messages exchanged between **GARFIELD**, OWENS, WISDOM III, and Colton PELTS (User ID: 100009106173104) between on or about June 11, 2019 and on or about September 1, 2019, obtained from a previously issued search warrant.³ Those messages contained discussions about the research, procurement, and development of improvised explosive devices (IEDs), illegally manufactured firearms, ammunition, and ballistic body armor to be used in attacks against racial and religious minorities, as well as discussions regarding **GARFIELD**'s possession and procurement of firearms.

15. On or about June 11, 2019, **GARFIELD** sent a Facebook message to WISDOM stating, “My Mauser” along with the following four images:

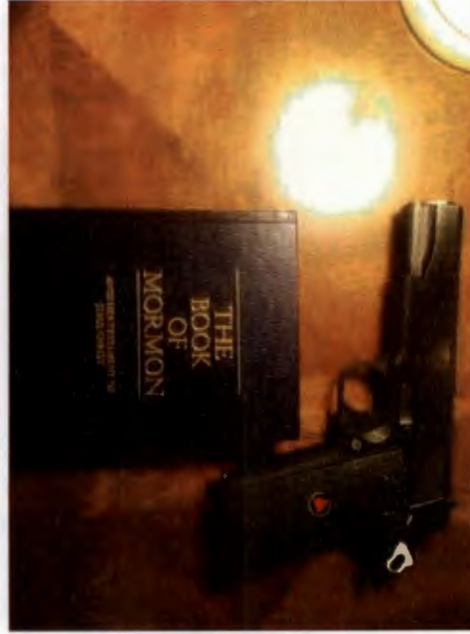
² “1488” is a popular white supremacist numeric symbol. “14” is shorthand for the “14 Words” slogan, “We must secure the existence of our people and a future for white children.” “88” is numeric shorthand for “HH,” which is shorthand for “Heil Hitler,” as “H” is the eighth letter in the alphabet.

³ Case Number: 2:19CM40.



16. On or about June 11, 2019, GARFIELD sent a Facebook message to WISDOM stating, "Two of my ARs and my Colt Delta Elite" along with the four following images:



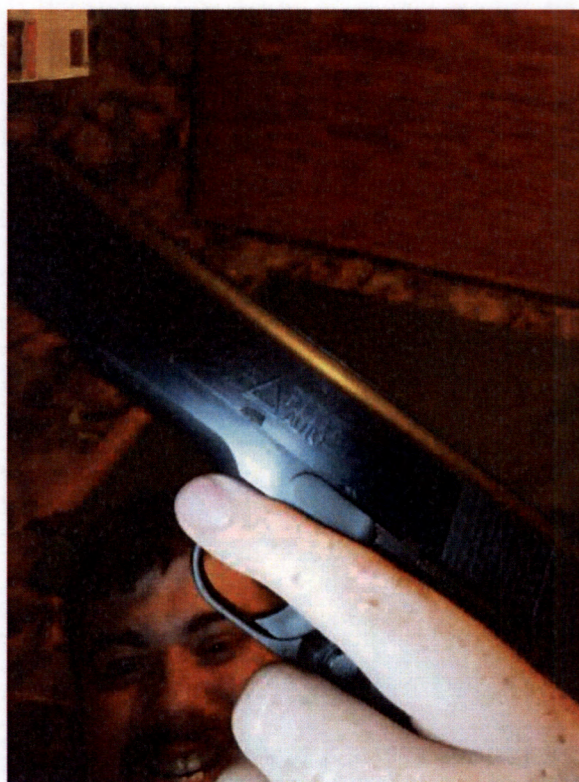


17. On or about June 11, 2019, GARFIELD sent a Facebook message to WISDOM stating, “Based and redpilled. My duty AR is really simple. Aero Precision upper receiver and handguard, Savage lower, Magpul stock. The only thing I did for myself was a 14.5” Rosco 5.56 barrell with a 1:7 twist and a Geissele SSP trigger. And I put a Vortex UH-1 holographic sight on it[.]” GARFIELD then followed stating, “My flip up sights are just magpul and I love them, they’re simple and they work” along with the following two images:



18. On or about June 12, 2019, **GARFIELD** sent a Facebook message to WISDOM III stating, “I rarely even wear a hat. But I wear gloves every time I go shooting because I’m putting at least 1k rounds downrange when I’m training[.]” WISDOM III responded stating, “Damn. I’d like to get out and shoot more, but I don’t have any money and haven’t had any luck trying to get a summer job. So I’ve got 120 rounds that I have to conserve.” **GARFIELD** responded stating, “I’ve got like 5k in reserve[.]”

19. On or about June 23, 2019, **GARFIELD** sent a Facebook message to WISDOM stating, “Just carry a 10mm like me” along with the following image:



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20. On or about June 23, 2019, **GARFIELD** sent a Facebook message to WISDOM stating, “I’ve got a guy that can order [a firearm] to his shop” adding, “He’s in Atkins though so it’s a bit of a drive but he has good shit. The first gun I seen when I walked in for the first time

⁴ On March 9, 2020, CS2, referenced in paragraph 31 below, identified the person in the image as **GARFIELD**.

was a suppressed M82a1[.]” Later in the Facebook message conversation, GARFIELD stated, “He carries a lot of suppressors. I seen a suppressed FAL and got to fingerfuck the fuck out of it[.]” WISDOM replied stating, “Bet it was painful not buy it[.]” GARFIELD responded stating, “Yep. Especially since I can’t afford it and would never pass the check for a suppressor[.]”

21. Through the course of this investigation, it was determined that **GARFIELD**, WISDOM III, OWENS, and PELTS, were participants in a Facebook Messenger chat group named “Right Wing Death Squad.” The following conversations between **GARFIELD**, WISDOM III, OWENS, and PELTS took place over Facebook Messenger between August 2, 2019 and August 26, 2019:

a. On August 2, 2019, WISDOM III messaged **GARFIELD**: “[W]e can take care of druggies any time. We need to get rid of Jews ASAP though.” **GARFIELD** responded, “[d]o both at the same time. Clean up the white community and show them who's controlling and manipulating and our numbers go up... We don't have the time to do one goal at a time.” WISDOM III stated, “I'm aware. Doesn't mean we need to be too hasty though. We need at least a rudimentary plan and proper resources before we try anything big.”

b. On August 4, 2019, **GARFIELD** messaged WISDOM III: “WE CAN ACCELERATE TODAY FOR A NEW WORLD TOMORROW.” WISDOM III responded, “Give me some ammo and a couple extra mags. I've already got a couple of guns that'll be sufficient at the very least.” **GARFIELD** messaged, “I'm really tempted to act soon. I can't stand by and do nothing.” WISDOM III asked, “How many others do we have on our side that we immediately know of?” **GARFIELD** responded, “I don't know of anyone outside of Atomwaffen⁵ but they're

⁵ I believe this to be a reference to Atomwaffen Division, a Neo-Nazi, and terroristic national socialist organization.

all out of state and I don't know if I trust them...Let's just pull a McVeigh⁶ in little rock.” WISDOM III replied, “Possibly.”

c. On August 5, 2019, WISDOM III stated, “[a] few thousand rounds of ammo, 20 mags, and a couple of automatic rifles... Throw in an armored vehicle and a small crew could do some serious damage. Some explosives could further the destruction.” **GARFIELD** responded, “I need a more permanent solution.” WISDOM III messaged, “you'll have to find more patience and save funds to afford better gear, and spend time gathering a larger group to carry out your plan.” **GARFIELD** stated, “Just fucking McVeigh the DNC”, and WISDOM III replied, “[t]hen you know what to buy. Call me up when you've got it and I'll be more than happy to help.”

d. On August 7, 2019, **GARFIELD** messaged another user, “SPICS AND NIGGERS NEED TO HANG FROM TREES.”

e. On August 8, 2019, WISDOM III messaged **GARFIELD**: “[1]0mm is best millimeter though.” **GARFIELD** replied, “Yes it is. I only own one unfortunately. I need another...I've hit steel at 120 yards with it shooting Sig FMJs and it hit pretty hard...I just need to use it on some niggers now.”

f. On August 8, 2019, **GARFIELD** messaged a group chat and stated to OWENS, “I want a full auto Scar H. Travis, hook me up with some goodies from the armory. I'll pay you \$100 worth of McChickens.” OWENS responded, “Lol I can't do that with how the security is now in the military it's ridiculous to get your issued M16A4 service rifle.”

g. On August 16, 2019, **GARFIELD** messaged the group chat and stated “I have access to 300k lbs of anhydrous ammonia⁷. Just need a container to store it.” OWENS

⁶ I believe this to be a reference to Timothy McVeigh, an American domestic terrorist who perpetrated the 1995 Oklahoma City bombing that killed 168 people and injured over 680 others.

⁷ Anhydrous ammonia is a common chemical compound used in fertilizer that can also be used as an explosive/WMD precursor, which **GARFIELD** has access to via his employment at ConAgra

responded, "Nice I have combat engineers as friends with access to c4." **GARFIELD** replied, "What kind of container does that shit need again?...Something that can handle high pressure with a release valve to bleed off excess pressure. I could probably make one with spare parts from the refrigeration guys at work. BOMBS AWAY MR. MCVEIGH." OWENS messaged, "[y]es kill them all...I have access to so much hahaha we can make it rain bullets for days."

h. On August 20, 2019, **GARFIELD** messaged PELTS stating that he wanted to kill Black people, to which PELTS responded "Let's do it."

i. On August 22, 2019, WISDOM III messaged **GARFIELD**: "[w]hites have true diversity. We are not all the same. Our differences are what make us unique and human. Niggers have no such luxury, nor do they truly understand that concept. They ask think in the same selfish animal way. And that's all they are- animals. And with the current state of the world, they have become severe pests. They must be eradicated. Completely and utterly." **GARFIELD** replied, "Racism isn't real, whites are the only humans."

j. On August 26, 2019, WISDOM III messaged the group chat, "Anyone want to try produce a B-50 BRB with me then?" "Killing niggers is a greater source of dopamine. KKK tested, *unofficially* Crusade approved." On August 26, 2019, PELTS responded "I'll do it James," to which WISDOM III wrote "We need a 50 gallon barrel, a shit load of duct tape, an ass ton of potassium nitrate (go to the co-op and claim it's for stump removal or hobby rocket building if asked, hope not to get arrested since both can technically be seen as true), lots of sugar, and some cardboard. I've got \$40 to give to the cause, which can get 3 things on our list." PELTS responded "Idk where to get a 50 gallon barrel" and WISDOM III responded "Online. Seriously, you can get 50 gallon drums/barrels all over the internet if you look." PELTS responded "Ok."

Foods.

WISDOM III continued, “Now we just need that sweet, sweet, potassium nitrate⁸...But honestly, if we're doing something like this, forget the barrel. Just get a shit load of PVC pipe. Preferably two sizes, of which one should fit somewhat loosely inside of the other. Because then we can make knockoff Panzerschreck launchers...Might as well have a couple hours of fun instead of a few seconds.”

22. On October 18, 2019, the FBI received information concerning private chat messages between an account created on October 9, 2019, with the User ID: 100042287731351, using the name “Jason Vulgamore,” and a Facebook user identified as Cameron MASON. Based upon the information associated with the User ID: 100042287731351, it is believed that **GARFIELD** is the user of the account. The cellular phone number associated one of **GARFIELD**'s previously referenced Facebook accounts, 479-214-2684, is associated with User ID: 100042287731351.

23. The following conversation between **GARFIELD** and MASON took place over Facebook Messenger between October 14, 2019 and October 15, 2019:

a. On October 14, 2019, **GARFIELD** messaged MASON: “Soon brother...white marker...Saint Tarrant.”⁹ MASON responded, “I don't get it.” **GARFIELD** then sent the following images showing a firearm with serial number BLUZ319:

⁸ Potassium Nitrate is a common chemical compound often used in fertilizer that can also be used as an explosive/WMD precursor.

⁹ I believe “Saint Tarrant” is a reference to the Christchurch, New Zealand mosque shooter, Brenton Tarrant.



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¹⁰ I believe the images on **GARFIELD**'s handgun are decorated similarly to the rifle used by the Christchurch, New Zealand mosque shooter, Brenton Tarrant.

¹¹ I believe the symbol bearing resemblance to a hashtag or pound sign is likely a reference to the Iron Guard, a Romanian fascist group.

¹² I believe the slogan "13=50" may be a reference to the perceived belief that despite only making up 13% of the population, African Americans commit 50% of crime.

¹³ I believe the acronym "A30B" is likely a reference to the Azov Battalion, which is a Ukrainian National Guard Unit with Neo-Nazi ties.

¹⁴ I believe the numbers "42089" are likely a reference to Adolf Hitler's birthday, April 20, 1889.



15 16

b. On October 15, 2019, **GARFIELD** reached out to MASON and messaged, “The AR¹⁷ is next. And to explain some of them, 4/20/1889 is Hitler's birthday, Azov battalion is a Ukrainian Right Wing Death Squad, Kali Yuga is a stage of enlightenment, where the world is right now, the Iron Guard was a Romanian Orthodox Fascist political party, Prinz Eugen was the SS division my great grandfather started in, and I chose the 2nd Latvian insignia because Saint Tarrant¹⁸ had the 1st Latvian on his rifle.”

GARFIELD's Residency at THE TARGET LOCATION

24. The investigation to date has determined that **GARFIELD** lives with his fiancé and her family at **THE TARGET LOCATION**.

¹⁵ I believe the number “14” was painted next to the word “Dirlewanger” and may be a reference to the “14 words” slogan initially coined by David Lane, a member of the white supremacist group known as “The Order.” The “14 words” state, “We must secure the existence of our people and a future for white children.”

¹⁶ I believe the 2nd Latvian insignia is displayed on the slide of **GARFIELD's** handgun following the word, “Dirlewanger.” “Dirlewanger” may be a reference to former Nazi SS Officer Oskar Dirlewanger, or the penal unit he created within SS called the Dirlewanger Brigade.

¹⁷ I believe this to be shorthand for “assault rifle.”

¹⁸ I believe Saint Tarrant is in reference to Brenton Tarrant who has been hailed as a saint by many within white supremacist groups.

25. On October 26, 2019, FBI surveillance observed a 1999 Toyota 4Runner, green in color, bearing Arkansas license plate, 208 XXZ, at **THE TARGET LOCATION**. An Arkansas Department of Motor Vehicle (DMV) query of Arkansas license plate, 208 XXZ, associated **GARFIELD** with the 1999 Toyota 4Runner.

26. On October 27, 2019, FBI surveillance observed the 1999 Toyota 4Runner, green in color, bearing Arkansas license plate, 208 XXZ, at **GARFIELD's** place of employment, Conagra Foods, 3100 East Main St., Russellville, Arkansas, which is in the Eastern District of Arkansas, during the nighttime hours.

27. At approximately 5:30AM, on October 27, 2019, FBI surveillance observed a male, believed to be **GARFIELD**, departing the Conagra parking lot in the 1999 Toyota 4Runner, green in color, bearing Arkansas license plate 208 XXZ. At approximately 8:00AM, the vehicle was observed parked at a residence on the south side of County Road 4490, 2.3 miles west of Ozone, Arkansas.

28. On October 29, 2019, **GARFIELD** and PELTS were observed by the FBI surveillance team traveling to Wilkerson Auto Sales, 1005 North 18th Street, Ozark, Arkansas, in the 1999 Toyota 4Runner, green in color, bearing Arkansas license plate 208 XXZ. **GARFIELD** then left Wilkerson Auto Sales driving a red in color, 2006 Chevrolet Silverado, VIN 2GCEC19ZX61313364. It is believed that **GARFIELD** purchased the 2006 Chevrolet Silverado on or about October 29, 2019.

29. On November 17, 2019, Arkansas license plate, 465YUE, was observed on the 2006 Chevrolet Silverado, VIN 2GCEC19ZX61313364. This license plate was registered to **GARFIELD** on or about November 15, 2019.

30. On November 19, 2019, FBI surveillance observed a Green Toyota 4Runner arriving at **THE TARGET LOCATION**. Two males were observed working on the 2006 Chevrolet Silverado, Arkansas license plate 465YUE at **THE TARGET LOCATION**. Later, the 2006 Chevrolet Silverado, Arkansas license plate 465YUE, was observed being towed to Luke's Automotive and Diesel Service, 3882 AR-22, Paris, Arkansas.

Communications and Meetings with CS2

31. A confidential human source (hereinafter "CS2") has been meeting with and having conversations via text messaging with **GARFIELD**. CS2's information has proven truthful and reliable. CS2's information has been repeatedly corroborated through surveillance and review of recorded meetings with the **GARFIELD**. CS2 has no criminal history and is motivated by money, sense of duty, and patriotism.

32. On or about November 5, 2019, **GARFIELD** and CS2 engaged in the following text conversation:

GARFIELD: Lady has meltdown at local Domino's:

GARFIELD: Gotta carry to get pizza.

CS2: Those black bitches are wild man. Also, that 300 clip was funny as fuck.

GARFIELD: That's why I carry my 10mm everywhere.¹⁹ I don't want to be caught in a chimpout trying to get a burger and not be able to kill a few niggers in the process.

¹⁹ Based on my knowledge of the investigation, I believe that he is referring to one of the firearms that **GARFIELD** owns and possesses, specifically the firearm he referenced in his August 8, 2019, Facebook Messenger conversation (see Paragraph 21.e. above), as well as pictured in his June 11, 2019, and June 23, 2019 Facebook messages to WISDOM III (see Paragraphs 16 and 19 above, respectively).

33. The following conversation between **GARFIELD** and CS2 took place over text messaging on or around November 20, 2019:

CS2: Where are you living now?

GARFIELD: Ozone. It takes me about an hour to get to work.

CS2: Oh fuck that.

GARFIELD: But it's rent free and I live with my fiancée. I really don't want to move away from her but any time something happens I miss work cause it's so far.

CS2: Yea. I feel ya. Rent free is hard to pass up. Do you like her family?

GARFIELD: Yeah, they took me in and they've treated me better than my blood family.

CS2: That's good man. They sound like solid people.

34. On or about November 28, 2019, **GARFIELD** and CS2 engaged in the following text conversation:

GARFIELD: Yep. Already had to brandish on some niggers.

CS2: Oh shit. I bet they ran like pussies.

GARFIELD: They did. We were at a gas station and [**GARFIELD**'s fiancé] got out to stretch her legs when 3 of them started their niggerspeak and started walking over so I pulled out the AR²⁰ and said fuck off niggers.

35. On or around December 6, 2019, CS2 was instructed to conduct a consensually monitored and recorded meeting with **GARFIELD**. FBI surveillance observed CS2's meeting with **GARFIELD** inside a restaurant, in Fort Smith, Arkansas, which is in the Western District of Arkansas.

²⁰ Based upon my knowledge of the investigation, I believe "AR" is shorthand for "assault rifle."

36. Later the same day, FBI surveillance team observed CS2 and **GARFIELD** travel to **GARFIELD's** residence located at **THE TARGET LOCATION**. During the meeting, **GARFIELD** introduced "Colton"²¹ to CS2.

37. Affiant listened to a live-monitoring device and overheard **GARFIELD** and CS2 discussing the paint markings on the firearm, referenced in Paragraph 23, above. Based on my experience and training, Affiant believes sounds heard during live monitoring were slides of a firearm(s) going forward.

38. Affiant met with CS2 immediately after he/she left **THE TARGET LOCATION**. While at **THE TARGET LOCATION**, CS2 observed (1) Glock pistol, (1) 1911 style firearm, (2) AR-15 style rifles, (1) Mauser manufactured firearm, (1) full automatic firearm, and (2) upper receivers in the bedroom believed to be occupied by **GARFIELD** and his fiancé.

39. CS2 also advised Affiant that during the meeting **GARFIELD** and "Colton," discussed renting a U-Haul truck, filling the vehicle with Tannerite, and shooting the vehicle in order to blow up the Bureau of Alcohol, Tobacco, Firearms, and Explosives office in Little Rock, Arkansas.

40. On or around December 6, 2019, **GARFIELD** provided CS2 with a .125 drilling jig, which can be used for properly aligning and drilling the third hole for a full auto sear in an AR-15 style lower receiver.

41. On or around December 13, 2019, **GARFIELD** messaged CS2 "100 good ol boys raid the stores for semis worth of tannerite and ammo and begin a guerilla war" and expressing his belief that "soon it won't just be a dream."

²¹ I believe "Colton" to be Colton PELTS.

42. On or around December 17, 2019, FBI surveillance observed **GARFIELD** meeting with CS2 at a commercial business located in Fort Smith, Arkansas. During the meeting with CS2, **GARFIELD** offered to convert CS2's AR-15 lower to fully automatic. Additionally, **GARFIELD** claimed to have done this for five other people.

43. On or around December 17, 2019, **GARFIELD** advised CS2 that he knew he was not allowed to buy a firearm because he was a firearm prohibited possessor.

44. On or about December 28, 2019, **GARFIELD** texted CS2 "Get out the napalm and agent orange. I'm gonna make my grandpa proud." **GARFIELD** then sent CS2 a screen shot of chemicals "frequently bought together" and stated "Oh yea, that's taking me back to junior year." CS2 responded "I wonder how much it would take to really be able to fucking something up." **GARFIELD** responded "It burns dirt so a couple of pounds could do wonders." CS2 then sent **GARFIELD** an emoji with a puzzled face, to which **GARFIELD** responded "Let me find my old infographic folder and I'll show you some things." **GARFIELD** then sent CS2 several graphics with instructions on how to make firebombs and other explosive devices.

45. On or about December 30, 2019, **GARFIELD** and CS2 engaged in the following text conversation:

GARFIELD: Got pulled over by a nigger cop on the way in to work with a couple of guns on me. I thought I was gonna have a problem with him, he immediately became a dick when he walked up to my window.

CS2: Oh shit! What happened.

GARFIELD: He said I didn't yield long enough despite it being a straight stretch with no coming traffic. He came up to the window with his hand already on his gun and being an uppity nigger. I was very tempted to draw and fire when he walked away.

CS2: Fuck that nigger. And they wonder why they are getting shot lately. That's some bullshit. All they do is harass people.

GARFIELD: I had two ARs and my Colt with me.²² I'm glad he didn't search the vehicle.

46. On or about January 14, 2020, **GARFIELD** sent CS2 the following text and image:

GARFIELD: Feels good to walk around in but it smashes your dick when you sit down.



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²² Based on my knowledge of the investigation, **GARFIELD** is referring to firearms he owns and possesses.

²³ Affiant believes this photo is of **GARFIELD**. This firearm also appears to be the same firearm depicted in **GARFIELD**'s June 11, 2019 Facebook message to WISDOM III (see Paragraph 16 above), as well as the firearm he is posing with in the June 23, 2019 Facebook message **GARFIELD** sent to WISDOM III (see Paragraph 19 above).

47. On March 11, 2020, CS2 and **GARFIELD** met at **THE TARGET LOCATION**. CS2 advised Affiant that **GARFIELD** asked if CS2 would be interested in attacking Arkansas State Senator Stephanie Flowers.²⁴

48. On March 11, 2020, CS2 observed one (1) suppressor, one (1) full-automatic assault rifle, one (1) full auto sear, and three (3) handguns (FN 45, Glock pistol, and Springfield 1911). Additionally, CS2 observed approximately 1000 rounds of green tip and 10mm ammo.

49. On March 11, 2020, CS2 observed **GARFIELD** firing an AR, believed to be fully automatic, from the second story balcony of **THE TARGET LOCATION**.

Additional Evidence of GARFIELD's Possession of Firearms and Machine Guns

50. On or around December 6, 2019, Affiant utilized a grand jury subpoena to obtain the purchase history for **GARFIELD** from New Frontier Armory. A review of the subpoenaed records revealed the purchase of (1) M-16 Drilling Jig (SKU TL-M16-JIG)²⁵ and (1) M-16 Full Auto LPK (SKU LPK-M16).²⁶ Invoice NFA31878, dated August 27, 2019, had a billing and shipping address registered to "Jason Garfield," PO Box 1724, Clarksville, AR 72830, and a telephone number listed as (479) 214-2684.

51. On February 12, 2020, the Honorable District Judge P.K. Holmes III, seated in the Western District of Arkansas, issued an order authorizing the interception of electronic communications to and from the mobile device, assigned 479-214-2684, used by **GARFIELD**.²⁷

52. On February 16, 2020, FBI surveillance observed **GARFIELD** at a gun show at the Arkansas State Fairgrounds, 2600 Howard Street, Little Rock, Arkansas 72206. An individual

²⁴ Sen. Stephanie Flowers is an African American senator representing Arkansas District 25.

²⁵ M-16 Drilling Jig is made for properly aligning and drilling the third hole for a full auto sear in an AR-15 style lower receiver.

²⁶ M-16 Lower Parts Kit (LPK) includes parts to assemble a full auto sear.

²⁷ Case Number 2:20CM13.

at the Arkansas State Fairgrounds advised an FBI Task Force Officer (“TFO”) that **GARFIELD** purchased a Springfield, .45 caliber handgun from his/her booth.

53. On February 17, 2020, **GARFIELD** text messaged Jacob WILLEMS, “I bought a Springfield 45.”²⁸

54. On February 18, 2020, Samuel WILLEMS text messaged **GARFIELD**, “How much for the 1911 again.” **GARFIELD** responded, “500”. Later that day, Samuel WILLEMS offered to purchase the firearm and asked **GARFIELD** for the serial number. **GARFIELD** responded to Samuel WILLEMS, “Ww57358.”²⁹

GARFIELD’S Prohibited Status

55. On November 10, 2015, a licensed professional counselor, filed a petition to involuntarily commit **GARFIELD** stating that he was “a clear and present danger to himself/herself or others.”³⁰ That same date, a Johnson County, Arkansas Circuit Judge issued a Pick-Up Order to transport **GARFIELD** to court for a hearing set for November 12, 2015.

56. On November 11, 2015, a Johnson County, Arkansas Sheriff’s deputy served **GARFIELD** with a Summons, Statement of Rights and Petition.

57. On November 12, 2015, after a hearing, the Court entered an order finding **GARFIELD** “poses a clear and present danger to himself/herself or others,” and involuntarily committed **GARFIELD** to a facility for seven days for evaluation. **GARFIELD** was present for the hearing and represented by counsel.

²⁸ I believe this to mean a Springfield 1911 .45 ACP handgun.

²⁹ I believe this is the serial number for the firearm purchased by **GARFIELD** on February 16, 2020.

³⁰ Johnson County, Arkansas Circuit Court Case No. 36-PR-15-185.

58. On November 17, 2015, **GARFIELD**'s mother filed a Petition for Order of Protection and an accompanying affidavit seeking an order of protection against **GARFIELD**.³¹ In the affidavit, **GARFIELD**'s mother stated that on November 9, 2015, **GARFIELD** told her, "If anyone comes to take me away I'm going to slit your fucking throat you worthless piece of shit." **GARFIELD**'s mother also stated, "[**GARFIELD**] has physically assaulted me less than a year ago and has made threats on my life regularly since the attack."

59. On November 20, 2015, a Johnson County, Arkansas Sheriff's deputy personally served **GARFIELD** a copy of the petition, ex parte order of protection, summons, and warnings. In the warnings it stated, "It is a federal offense for an individual who is subject to a Final Order of Protection or convicted of a misdemeanor of domestic violence to ship, transport, or possess a firearm or ammunition pursuant to 18 U.S.C. §922(g)(8) and (9)."

60. On December 16, 2015, the Johnson County, Arkansas Circuit Judge, after a hearing, entered a Final Order of Protection. The Court stated **GARFIELD** had "been provided with proper notice and the opportunity to be heard," and found **GARFIELD**'s mother was "in immediate and present danger of domestic abuse." The Order is effective until December 16, 2025.

Need for Nighttime and No-Knock Warrant

61. In accordance with Federal Rule of Criminal 41§ (2)(ii), I request for good cause shown that the warrant expressly authorize execution of the warrant during nighttime hours (between 10:00 p.m. and 6:00 a.m.) without first alerting occupants to law enforcement presence.

62. During the course of this investigation, agents have determined that **GARFIELD** lives at **THE TARGET LOCATION**. I know in my training and experience that individuals who

³¹ Johnson County, Arkansas Circuit Court Case No. 36-DR-15-279.

have firearms store them in their residences and maintain them for long periods of time, frequently for many years.

63. On December 6, 2019, CS2 observed an AK-47³² weapon placed near the entrance of **THE TARGET LOCATION**.

64. On March 11, 2020, CS2 observed **GARFIELD** discharge a fully automatic assault weapon off the balcony of **THE TARGET LOCATION**.

65. **THE TARGET LOCATION** is clearly marked with “no trespassing” signs in order to deter unauthorized visitors.

66. **THE TARGET LOCATION** is in a remote, rural area that can only be approached by one roadway. The roadway to **THE TARGET LOCATION** is easily observed by the occupants, and pedestrians and vehicles unfamiliar to the region do not typically travel through the area.

67. Based upon my training and experience, I believe there is a significant risk of a violent confrontation with **GARFIELD**, and that nighttime and no-knock authorizations are necessary to mitigate this risk and improve the safety of Agents, **GARFIELD**, other residents of **THE TARGET LOCATION**, and any persons in the area.

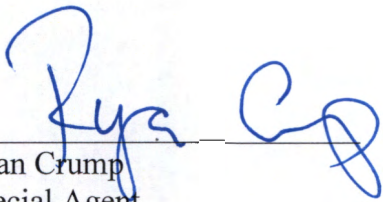
68. During the course of the investigation, **GARFIELD** espoused a personal ideology that is violent and anti-government, to include contemplation of violence toward law enforcement when confronted. **GARFIELD** is heavily armed and appears proficient in the use of firearms. The rural location and single avenue of approach prevent a covert approach to **THE TARGET LOCATION** during daylight hours. Agents can reduce the likelihood that **GARFIELD** may gain access to a firearm and engage Agents by approaching during nighttime and making entry to **THE**

³² Avtomat Kalashnikova (AK).

TARGET LOCATION, without knocking. Your Affiant requests authorization to serve this search warrant during nighttime hours, without knocking.

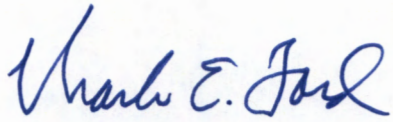
CONCLUSION

69. Based on the foregoing, your affiant believes that there is probable cause for a nighttime, no-knock Search Warrant for 2310 Country Road 4490, Ozone, Arkansas, the residence of Jason D’Juan **GARFIELD**, for violations of Title 18 U.S.C. §§ 373, 875(c), 922(g), 922(o) and 2332a.



Ryan Crump
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me this 12th day of March 2020.



HONORABLE MARK E. FORD
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

Location: 2310 County Road 4490, Ozone, Arkansas

Description: Multiple level residential dwelling, including: a two-level residence, a shed, a camper, and other outlying structures.



ATTACHMENT B

ITEMS TO BE SEARCHED FOR AND SEIZED

Property and records (whether in the form of printed documents or stored in electronic or digital form) tending to establish and document a prohibited person in possession of firearms, solicitation to commit a crime of violence, interstate communication of a threat, and conspiracy to use a weapon of mass destruction including but not limited to the following:

1. Books, records, receipts, notes, bank statements, and other bank records, money drafts, letters of credit, money orders, cashier's checks, and other monetary instruments, passbooks, bank checks, safe deposit box keys and records, and items evidencing the obtaining, secreting, transfer, and/or concealment weapons of mass destruction.
2. Personal and business calendars, address and/or telephone books, rolodex indices, pagers, cellular telephones, pager or cellular telephone memory, and papers reflecting names, addresses, telephone numbers, pager numbers, fax numbers, telex numbers, correspondences of subjects of the investigation, and their criminal associates, and financial institutions.
3. Weapons and counter-surveillance equipment that might be utilized in the conduct of solicitation to commit a crime of violence or use of weapon of mass destruction.
4. Photographs, and/or video tape reproductions of co-conspirators and weapon(s)
5. Firearms and firearms components, including: upper receivers, lower receivers, magazines, springs, barrels, firing pins, and other parts utilized to discharge ammunition from a firearm.
6. Firearm suppressors, or other attachments intended to reduce the visual muzzle flash or sound caused by the discharge of a weapon.
7. Accessories, bags, slings, holsters, safes, magazine pouches, or tactical gear employed to store, retain, conceal, or employ firearms or other weapons.
8. Machinery and tools that could be employed to modify or alter firearms, build suppressors, or manufacture firearms equipment.
9. Explosives and explosive components.
10. Hazardous chemicals or chemical components that could be employed to create explosives, including but not limited to: Tannerite and anhydrous ammonia.
11. Barrels or tanks utilized for the storage of hazardous chemicals.

12. Tactical body armor and personal protective equipment, including but not limited to: eye protection, hearing protection, gloves, gas masks, chemical suits, ballistic rated ceramic plates, Kevlar plates, and plate or Kevlar carriers.