

UNITED STATES DISTRICT COURT

for the
Western District of Arkansas

US DISTRICT COURT
WESTERN DIST ARKANSAS
FILED

MAR 15 2016

By DOUGLAS F. YOUNG, Clerk
Deputy Clerk

In the Matter of the Search of
(Briefly describe the property to be searched
or identify the person by name and address)

The residence of Maverick Dean Bryan, located at 302
Parker Drive, Mineral Springs, Arkansas 71851

Case No.

4:16 CM 05

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 the property to be searched and give its location):
See 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):

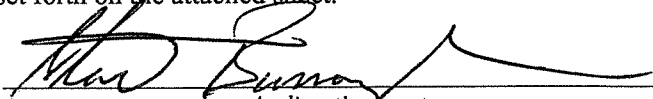
- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 876(c)	Mailing Threatening Communications

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

FBI Special Agent Steven Burroughs
Printed name and title

Sworn to before me and signed in my presence.

Date: 3/15/16


Judge's signature

City and state: Hot Springs, Arkansas

Barry Bryant, United States Magistrate Judge
Printed name and title

ATTACHMENT A
Premises To Be Searched

In the Matter of the Search of the residence located at 302 Parker Drive, Mineral Springs, Arkansas 71851, the premises is further described as a tan in color, single wide, metal, house trailer with dark brown trim. A screened porch is attached to the front of the house trailer and a metal pre-fabricated car shelter with a red metal roof is positioned directly in front of the screened porch. The residence is positioned on the Northwest corner of the intersection of Parker Drive and Bass Lane with large pine trees in the yard. A small, black in color, decorative sign with the number 302 in white numerals is located near the edge of the front yard beside Parker Drive. Said premises is located in the Western District of Arkansas and can be located by following the following directions: From the United States Post Office in Mineral Springs, Arkansas travel West on State Highway 27 for approximately one mile to the intersection of Highway 27 and Schaal Road. Turn left onto Schaal Road and travel approximately four miles to the intersection of Schaal Road and Bright Star Road. Turn right onto Bright Star Road and travel approximately one tenth of a mile to the intersection of Bright Star Road and Cottonshed Lane. Turn left onto Cottonshed Lane and travel approximately one mile to the intersection of Cottonshed Lane and Parker Drive. Turn right onto Parker Drive and travel approximately one tenth of a mile to the intersection of Parker Drive and Bass Lane. Said premises will be located on the right side of Parker Drive and is positioned on the Northwest corner of Parker Drive and Bass Lane.

FRONT

302 PARKER DR.
MINERAL SPRINGS, AR



REAR

302 PARKER DR.
MINERAL SPRINGS, AR.



HOUSE NUMBER

302

302 PARKER DR.
MINERAL SPRINGS, AR.



ATTACHMENT B
Items to be seized

- a. Legal ruled notebook paper and white envelopes with similarities as those used in the seven threatening letters
- b. Handwritten documents containing plans for forming a militia, constructing a compound, construction of a water system, and similar topics as outlined in the seven threatening letters
- c. U.S. Postal Money Order Receipts from money orders used to pay for Thrifty Nickel advertisement
- d. Books, papers, news articles, and/or magazines containing information about militias or the militia movement
- e. Address books, phone books, documents, and/or lists containing names, addresses, and/or telephone numbers of potential Co-conspirators
- f. Documents and/or notes containing the addresses and other information pertaining to the Mayors and other governmental officials of Hope, DeQueen, Nashville, Murfreesboro, Prescott, Lewisville, and Ashdown, Arkansas

AFFIDAVIT

UNITED STATES DISTRICT COURT, WESTERN DISTRICT OF ARKANSAS
TEXARKANA DIVISION

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR SEARCH WARRANT

Now comes your Affiant, Special Agent (SA) Steven F. Burroughs, who, after being duly sworn, deposes and states upon oath as follows:

I. INTRODUCTION

1. That I am a Special Agent (SA) of the Federal Bureau of Investigation (FBI) and have been so employed for approximately 18 years. As an FBI Special Agent, I am an investigative and law enforcement officer of the United States, who is empowered by law to conduct investigations of and to make arrests for violations of federal criminal law. Since my graduation from the FBI Academy in November 1997, I have been assigned to the Little Rock Division Field Office. I am currently assigned to the FBI's Little Rock Joint Terrorism Task Force (JTTF) with the primary responsibility of leading investigations involving matters related to Domestic Terrorism. Prior to my employment with the FBI, I was a Special Agent of the Georgia Bureau of Investigation for approximately 13 years. During my time as both a state agent and a federal agent, I have participated in the preparation and execution of numerous search warrants.
2. This Affidavit is made for the limited purpose of establishing probable cause to search the residence and any outbuildings located at 302 Parker Drive, Mineral Springs, Arkansas 71851, which is further described in Attachment A. For the reasons stated below, I submit that there is probable cause to believe that this location will contain evidence of a violation of Title 18, United States Code, Section 875 (Interstate transmission of threatening communications) and that a search of this location will result in the discovery of evidence of such activity, as further described in Attachment B.

II. PROBABLE CAUSE

A. CASE BACKGROUND

On or about the first week of 2015, threatening letters containing demands were received by the Mayors of Hope, DeQueen, Nashville, Murfreesboro, Prescott, Lewisville, and Ashdown, Arkansas through the United States Postal Service. Each Mayor received one handwritten letter that had been mailed in an envelope showing the same return address of 2nd Lt. Gary Owen, Southwest, Ark. All of the envelopes had been postmarked on 01/05/2015 in Shreveport, Louisiana. Each letter contained identical verbiage except for the specific mayor of the city to which it was addressed. The letters read as follows:

"Mayor of Hope (DeQueen, Nashville, Murfreesboro, Prescott, Lewisville, and Ashdown) Arkansas

There is a declaration in place to clean up and correct everything wrong in this United States of America. You and six other honorable good men of this county have been fortunate to be chosen for it all to begin right here this county (hempsted) will be a fine example for all

others to follow. Don't worry I am going to help you through it. First of all you and these other six honorable good men will call a county wide meeting, mandatory for all men ages between 17 and 100, where you will discuss the terms of surrender of this county unto me. Let's call me 2nd Lt. Gary Owen of the first Christian Militia of the United States of America. Now upon your prompt (and I suggest it be prompt) surrender you seven honorable men will discuss these things that will be put in place, first off only the Christian has a vote in any matter pertaining to the matter of the county, and its citizens. You will promptly ask all Socialist/Communist, Atheist, homosexuals, and Muslims, and those that worship any god besides Jesus Christ, to exit for these will have no vote or say in the governing of this One nation under God. Now the first order of the day, that you seven acknowledge your surrender (by the end of 1st month of 2015) you will throw this Common Core Corriculam out of each of the schools operating in the county of Hempsted and replace it with the corriculam of the 1930's until a proper Education secutary can be put in place in the state capital, which will be as soon as all other counties in this fine state of Arkansas follows your counties fine example, which will be accomplished by the years end of 2015, I have great faith in you seven honorable gentlemen. Now the second order of this great day will be the reestablishment of prayer in each class (and again in each school operating in hempsted county) K-12 at the beginning bell each morning to be as this - In the name of our Lord Jesus Christ we pray, Our Father, who art in heaven, Hollowed be thy Name... I believe you fine men, know the rest of the lord's prayer, which will be followed with the pledge of Allegiance of course. All so the Ten Commandments will be returned to the halls and offices, and each class room K-12 in each school operating in the county of hemstead, every office, hall, of every city, county, and state offices operating in the county of hemstead. This means especially each office, hall, and courtroom of the county court house and city court, which both will open with the same prayer and pledge that is required for our schools, and the bible of the original King James Version will be returned into the courts, so help you god, and moreover the marble cross and bible will be returned to the hall of the county court house to be set in the middle of the floor to be seen as entering. The dementions of the frames of the Ten Commandments will be no size smaller than one and a half feet by two and a half feet, no compromise, and too the third part of this decree, which the lord is going to bless our works and save many lives right here in our own counties. I pray we can come to a quick understanding that we can help many surrounding counties. Now the co-opment of all unused lands in the county to be used for growing of foods, livestock and feeds on a massive scale even if it got to be done by hand. Plus the inplacment of three, five mile long waterlines 110" for emergency use. Do not be fooled into this reverse osmosis nonsense of putting so called reclaimation from your treatment plant back into our water supply. All so proper storage of Electronics, batteries and emergency vehicals and other means of transportation for county wide use.

Disregard the words, or your surrender and I will except no excuses, remember there will be no forgiveness, I will prompley hang you seven honorable men from the great oaks on the court house lawn, I suggest Immediate surrender that we waist not another precious year."

B. MAVERICK DEAN BRYAN IDENTIFIED AS THE SUSPECTED LETTER WRITER

During the course of this investigation, FBI-Little Rock contacted members of the Howard County Sheriff's Department. Howard County Sheriff Bryan McJunkins and two of his Investigators, Jade Hughes and David Shelton, advised they each read the letter sent to the Mayor of Nashville and recognized the probable writer of the letter to be a former inmate of the Howard County Jail named

Maverick Dean Bryan, a white male, born 11/14/1960, of 302 Parker Drive, Mineral Springs, Arkansas 71851. The Sheriff and his Investigators advised they all had interactions with Bryan over the years and knew Bryan to hold "anti-government" sentiments. The officers described Bryan as being a survivalist type person who frequently conducts "training" in the woods around the Cottonshed area of Howard County.

Investigator Jade Hughes advised that in 2013, when Bryan was incarcerated at the Howard County Jail, he transported Bryan to and from the jail on several occasions. During these trips, Bryan frequently talked about his intense dislike for the "Common Core Curriculum" being used in the public school system. Bryan also readily articulated his dislike for African American persons and homosexuals. Investigator Hughes recalled Bryan telling him that one day he (Bryan) would hang the Sheriff and other Sheriff Department employees once Bryan was released from jail. Bryan also said he would one day hang the Circuit Court Judge; the Supreme Court Justices; and the President of the United States. Bryan frequently talked about his being an expert marksman with firearms. Bryan once told Hughes he (Bryan) had made plans to construct a "compound" and a water system in order to be prepared for the time when the government will collapse. Bryan stated he had written his plan out and had the written plan ready for when that time comes.

C. INTERVIEW OF BRYAN'S PROBATION OFFICER

On 12/22/2015, Lois White, Maverick Dean Bryan's Arkansas state probation officer, was interviewed and provided the following information:

White began supervising Maverick Dean Bryan on 03/12/2014. Bryan resides at 302 Parker Drive, Mineral Springs, Arkansas. Bryan is a very paranoid person who has expressed his dislike for the government on numerous occasions to White. Bryan has "ranted and raved" about his hatred for the Common Core Curriculum and has said the curriculum is a way for the government to control children. Bryan has talked about his disapproval of the homosexual lifestyle and blames the government for allowing it to become more accepted and widespread. Bryan has also told White that prayer should be mandated in the public school system. White advised the word "honorable" is frequently used by Bryan in his conversations with White. White pointed out that the use of the word "honorable" was used in the letters to the seven Mayors.

D. POSTING OF 1st AD IN THRIFTY NICKEL CLASSIFIEDS

During the course on this investigation your affiant learned an ad printed in the Thrifty Nickel Classifieds Newspaper and posted on the paper's web site on 08/12/2015 advised the following:

"2ND LT. Gary Owen Looking to borrow \$23 million to equip & train Christian militia to restructure country. Cotton Shed, N. End Millwood Lake, 302 Parke Dr. S.W. Ark."

From contacting the management of the Thrifty Nickel Classifieds (TNC), your affiant learned TNC received, via U.S. Mail, an ad placement form that had been filled out by hand requesting the ad be run in the paper. In addition to the wording to be used in the ad, the form showed the submitter as 2nd Lt Gary Owen, 302 Parker Drive, Mineral Springs, Arkansas 71851, telephone number 870-287-7309. A notation advising "Do not put phone # on Ad" was located at the bottom of the form. The ad placement form was accompanied by a U.S. Postal Money Order for \$20. The "Pay to" and

"From" sections of the money order had also been completed by hand. The "From" section displayed the name Maverick Bryan with an address of 302 Parker Dr., Mineral Springs, Arkansas 71851. Information contained on the money order revealed it had been purchased on 08/07/2015 from the Mineral Springs Post Office.

E. POSTING OF 2nd AD IN THRIFTY NICKEL CLASSIFIEDS

On 12/02/2015, the TNC received a second ad request for a similar ad to be run in the paper for two weeks. This request was hand written on a small section of legal ruled lined notebook paper and was contained in a small white envelope showing a return address of 302 Parker Drive, Mineral Springs, Arkansas 71851. The envelope was post marked in Shreveport, Louisiana on 11/30/2015. The request read as follows:

"2nd Lt. Gary Owen to borrow \$23 million Equip & Train Immediately Christian Militia to Restructure A Country North end Millwood Lake S-W-Arkansas-Cottonshed 302 Parker dr."

F. FBI HANDWRITING ANYLSIS RESULTS

During the course of this investigation, the threatening letters received by the various Mayors were provided to the FBI Laboratory's Questioned Documents Unit as were known writings of Maverick Dean Bryan. The letters were compared to the known writings by an FBI Forensic Examiner, who assessed the writer of the letters was Maverick Dean Bryan. The 1st ad request mailed to the TNC was also analyzed by the Questioned Documents Unit. The FBI Forensic Examiner assessed the writer of the ad request was Maverick Dean Bryan.

G. CONTACT BY CHS#1 WITH BRYAN THROUGH THE U.S. MAIL

On 01/20/2016, your affiant met with a Confidential Human Source (CHS), hereafter referred to as CHS#1, for the purpose of having CHS#1 attempt to make contact with Maverick Dean Bryan. At the request of your affiant, CHS#1 hand wrote a letter to Bryan in which CHS#1 referred to Bryan as Lt. Gary Owen. In the letter, CHS#1 advised he/she was interested in talking to Bryan (Lt. Owen) about his group's ideas on restructuring the country. CHS#1 addressed the envelope to North end Millwood lake, Cottonshed, 302 Parker Drive, Southwest Arkansas 71851 and your affiant mailed it.

On 02/19/2016, CHS#1 received a letter mailed to him/her through the U.S. Mail. The return address was displayed as Lt. Gary Owen, 302 Parker Drive, Mineral Springs, Arkansas 71851, the home address for Maverick Dean Bryan. Your affiant opened the envelope and read the letter. In the letter, the writer (Bryan) thanked CHS#1 for responding to the ad and invited the CHS to visit him on any Sunday afternoon.

H. INSPECTION OF THREAT LETTERS, TNC AD REQUEST, and LETTER TO CHS#1

An inspection of the envelopes and letters mailed to the seven mayors; the envelope and ad request mailed to TNC; and the envelope and letter mailed to the CHS revealed similarities. All of the envelopes were of the same size and style. All the envelopes were approximately four and three quarter inches by six and a half inches in size. All the envelopes were white in color, with self adhesive flaps and blue and white plaid pattern interiors. The paper used in each threat letter and the letter to the CHS was all legal ruled lined notebook paper with blue horizontal lines and a red

left margin line. Similarly, the small section of paper containing the second TNC ad request was also legal ruled notebook paper with blue horizontal lines.


I. MEETING BETWEEN CHS#2 AND MAVERICK DEAN BRYAN

On 02/21/2016, a Confidential Human Source, hereafter referred to as CHS#2, traveled to the home of Maverick Dean Bryan located at 302 Parker Drive, Mineral Springs, Arkansas 71851 to conduct a meeting with Bryan. CHS#2 previously had made telephonic contact with Bryan and Bryan had invited the CHS to come to his residence to talk about Bryan's ad requesting money to fund a Christian Militia. Upon arriving, CHS#2 was met in the yard by Bryan and invited into the residence to talk. During the meeting, which lasted for over one hour, Bryan discussed how he intended to form a Christian Militia to "overthrow" the United States Government. Initially, Bryan informed CHS#2 that he (Bryan) believed CHS#2 was an FBI Agent but after a period of time, in which the CHS spoke of his/her interest in Bryan's plan, Bryan indicated he believed the CHS was a "patriot." Bryan spoke of his belief in several common conspiracy theories which included the theory that the terrorist attack on September 11, 2001 was perpetrated by the U.S. Government. At one point, Bryan advised after the 9/11 attack he (Bryan) swore he would spend his life to overthrow the government. Bryan acknowledged he had run the ad in the Thrifty Nickel requesting money and advised "a complete sweep of the country is needed." During the conversation when Bryan was talking about the government, Bryan stated "I'll not settle for nothing less than to hang them all." Bryan continued and advised "My name is Maverick Bryan, and that's my real name. And, I am a patriot and I mean to hang every living President. And if I can, hang Jimmy before he dies. I'm going to enjoy that pleasure." In discussing his plan to recruit men to form the Militia, Bryan advised "This is what I was raised for. I knew when I was a youngster that I was the man that was going to overthrow this country." At one point in the conversation, Bryan told the CHS "I wrote seven Mayors around here. I told them that by January of this year you will surrender to me. You'll take this Common Core out of your schools and other things." When discussing his original suspicion that the CHS was an FBI Agent, Bryan advised "I knew you was FBI...You Know,... and ah... I told the Lord, if you was CIA, one of us was fixin to die, that day. Bryan went on to say he noticed the CHS was not armed so he was not worried about it and could look in the CHS' eyes and tell he/she was a patriot. When addressing his need for money, Bryan stated "With you or without you, I'm going to do it. I may die but I aint worried about that buddy." After the conversation, CHS#2 departed the location with an agreement with Bryan that he/she would return after discussing Bryan's need for financing with his/her investors.

III. CONCLUSION

Based on the above listed facts and circumstances, your Affiant has probable cause to believe that there will be, concealed at the residence and outbuildings located at 302 Parker Drive, Mineral Springs, Arkansas 71851, which is further described in Attachment A, evidence of a violation of Title 18, United States Code, Section 876(c), Mailing Threatening Communications. Therefore, your affiant respectfully requests: (1) authorization to search the above-described residence, including any outbuildings; and (2) authorization to seize all items listed and referred to in Attachment B.

Witness my hand this 15 day of March, 2016.


STEVEN F. BURROUGHS, FBI, Special Agent

Sworn and subscribe to before me on this 15 day of March, 2016.


United States Magistrate Judge