

# United States District Court

NORTHERN DISTRICT OF GEORGIA

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U.S.D.C. Gainesville

NOV 01 2011

By: *James N. Hatten*  
JAMES N. HATTEN, Clerk  
Deputy Clerk

UNITED STATES OF AMERICA  
v.

CRIMINAL COMPLAINT

RAY H. ADAMS

CASE NUMBER: 2:11-MJ-107

(UNDER SEAL)

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. Beginning on a date unknown, but at least as of September 2011, and continuing up to and including November, 2011, in Stephens County, Georgia and elsewhere, in the Northern District of Georgia defendant did,

aided and abetted by Samuel J. Crump and others, knowingly attempt to develop, produce, and possess a biological agent and toxin, to wit: ricin, for use as a weapon

in violation of Title 18 United States Code, Sections 175(a) and 2.

I further state that I am a Special Agent of 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

*David W. Wylie*  
\_\_\_\_\_  
Signature of Complainant  
David W. Wylie

Based upon this complaint, this Court finds that there is probable cause to believe that an offense has been committed and that the defendant has committed it. Sworn to before me, and subscribed in my presence

November 1, 2011 at \_\_\_\_\_  
Date

Gainesville, Georgia  
City and State

SUSAN S. COLE  
United States Magistrate Judge  
Name and Title of Judicial Officer  
AUSA Jeffrey A. Brown

*Susan S. Cole*  
\_\_\_\_\_  
Signature of Judicial Officer

AFFIDAVIT

I, David Wylie, being first duly sworn, do hereby depose and State:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and have been so employed for approximately twenty - five years. I am currently assigned to the FBI's office in Gainesville, Georgia. My investigative responsibility includes investigating different federal crimes such as bank robbery, bank fraud, mortgage fraud and domestic terrorism. I have been involved in investigations relating to domestic terrorism and have participated in the execution of search warrants and seized evidence that relates to violations of domestic terrorism statutes. I know the following principally based on information obtained from my investigation and from other law enforcement officers.

2. As a federal agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. This affidavit is in support of a request for a federal search warrant to be served upon and executed at the residence of Ray H. Adams, 558 Lakeside Road, Toccoa, Georgia, 30577 more fully described as a single story shelter constructed of wood

planks and metal roof. To the rear of the shelter is a travel trailer used for its kitchen facilities and storage. The shelter has no known basement and has a front and rear entrance. The residence is located within Stephens County. The exterior is wood plank with a front entrance. The property consists of 17.21 acres which includes the main living shelter and outbuildings separated from the shelter. The property is recorded on the Stephens County tax map as parcel number 058 086; to search for evidence, contraband and fruits of a crime as set forth in Exhibit B (attached hereunto and expressly incorporated herein by this reference), as well as any vehicles located on the property and any out buildings located on the properties. I am also requesting authority to search the referenced properties and any computers, and computer media located therein where the items specified in Attachment B may be found, and to seize all items listed in Attachment B as instrumentalities, fruits, and evidence of a violation of Title 18, United States Code Section 175, prohibitions with respect to biological weapons.

4. This affidavit is also being submitted for the purpose of securing a complaint and warrant for the arrest Ray H. Adams (ADAMS) for aiding and abetting Samuel J. Crump in the knowing attempt to produce and possess the biological toxin, ricin, for

use as a weapon in violation of Title 18, United State Code, Sections 175(a) and 2. I have not included each and every known fact concerning this investigation; rather, I have set forth only the facts believed necessary to establish probable cause for the issuance of the requested search warrants, complaints and arrest warrants. However, even though I have not included every fact known to date in this investigation, I do not believe anything has been omitted which would vitiate the probable cause set forth herein.

5. Ricin is a toxin as defined in Title 18, United States Code, Section 178(2) and is extracted from the seeds of the castor bean plant, *Ricinus communis*. Castor beans are used for food and agriculture, textile chemicals, paper, perfumes, cosmetics and pharmaceuticals. The materials needed to manufacture ricin are easy to acquire and the process of extracting it from castor beans requires no technical expertise. Ricin is manufactured using castor beans, acetone and lye. Recipes for making ricin are readily available on the internet and books on unconventional weapons. Ricin can be employed in either a powder or liquid form and has been used in assassinations or small contamination events. Ricin powder at the production site can pose an inhalation hazard for first responders.

## BACKGROUND OF THE INVESTIGATION

6. On 03/17/2011, a confidential human source (CHS1) consensually recorded a clandestine meeting involving members of a fringe group of a known militia organization, with the fringe group calling itself the "covert group." The meeting occurred at the residence of Frederick W. Thomas (THOMAS), and attendees at the meeting included THOMAS, Emory Dan Roberts (ROBERTS), and others. During the meeting, ROBERTS said he knew people in Habersham County [Georgia] who had a substance that could kill people with a very small amount. CHS1 suggested he was talking about ricin, and someone else agreed, adding that ricin is made from castor beans. The conversation then went into a discussion about castor beans and possible ways to obtain them.

7. On 04/16/2011, CHS1 consensually recorded a meeting at the residence of THOMAS that included THOMAS, ROBERTS, Ray Adams (ADAMS), and others. During the meeting, THOMAS talked about the need to take action against the federal government, to include assassinating government officials. THOMAS later asked if the other members were "committed to taking action" against the government, and ADAMS stated, "I am." ADAMS also made the following statements during the meeting:

a. "I'd say the first ones that need to die is the ones in the government buildings."

b. "When it comes down to it, I can kill somebody."

c. "Let me say it now, y'all are welcome to use my property at anytime."

8. On 05/17/2011, CHS1 met with THOMAS and ROBERTS. (This meeting was not recorded.) During the meeting, ROBERTS mentioned he had recently been talking to a former U.S. Army soldier in Stephens County [Georgia], described as a "loose cannon", who has manufactured ricin. ROBERTS said that he had personally seen the ricin in powder form.

9. On 06/24/2011, CHS1 consensually recorded a meeting with THOMAS and ROBERTS. ROBERTS stated that someone named Sammy may have access to beans that are used to make ricin. ROBERTS stated, "He has some of the beans." ROBERTS also said that Sammy was upset the war with the government had not already started.

10. On 08/09/2011, an Undercover Employee (UCE) made a consensually recorded telephone call to THOMAS. During the call, THOMAS stated that one of the people he was associating with had the type of beans needed to make ricin.

11. On 09/17/2011, CHS1 consensually recorded a meeting with ROBERTS at a Waffle House in Toccoa, Georgia. ROBERTS and CHS1 drove separately to the residence of ADAMS located at 558 Lakeside Road, Toccoa, Georgia. Samuel CRUMP arrived about 1 1/2 hours later. ADAMS told everyone he was a retired United States

Department of Agriculture employee. ADAMS showed the others plaques from his career regarding his certifications and training and advised that he had worked in the horticulture field.

12. When ROBERTS and ADAMS walked off, CHS1 asked CRUMP about a Center for Disease Control email address from one of CRUMP's previous e-mails to CHS1. CRUMP advised he previously had worked at the CDC and that he knew people everywhere. CHS1 then said to CRUMP, "The stuff that, um, Dan (ROBERTS) said you can make (reference to ricin), you still make that?" CRUMP replied, "Yea." The following conversation then occurred:

CRUMP: "What I'd like to do is make, uh, about 10 pounds of that (reference to ricin). Give you 2, me 2, Ray (ADAMS) 2, Dan (ROBERTS) 2, and somebody else 2. Put it out in different cities at the same time: Washington, DC; maybe Newark, NJ; Atlanta, GA; Jacksonville, FL; New Orleans. Dump that little (unintelligible) that's all ya gotta do is lay it in the damn road, the cars are gonna spread it."

CHS: "Yea, but what's it take to make it? I haven't got a clue."

CRUMP: "Just some seed. I got the, uh, got one more ingredient, and I'll get it today. (Unintelligible) you be here when we make it. Ray's (ADAMS) gonna make it."

13. CRUMP also made the following statements to CHS1

regarding the material (ricin):

a. "Ya got, ya can't let none of it get on your skin. Got to be a closed environment when it's made. No wind. If it gets up your nose . . . there's no cure."

b. "You got to know where the wind's comin' from. You can't be (unintelligible) yonder and go down wind. That shit's gonna follow ya."

14. CRUMP also told CHS1 about another substance even deadlier, stating "That other kind, 1 pound can kill 30 million people." CRUMP then stated, "We need somebody to back us with some damn money so we can make that other shit," which he then described as, "This is worse than anthrax." CRUMP added, "That shit's deadly! There ain't no damn, there ain't no cure for it either. And it works, I think within 2 hours."

15. CRUMP then suggested a scenario for dispersing ricin in the Atlanta area, telling CHS1 the following: "Ya get on the trunk of Atlanta, you get up on the north side, ya get on 41, ya throw it out there right on 285, ya go up 41 or 75, go up 75 to get away from it. Keep the heater on, that way it keeps the pressure out. Don't roll your window down."

16. CRUMP eventually called ADAMS over and the following conversation occurred:

CRUMP: "What's the name of that worst poison, Ray?"



ADAMS: "Ricin."

CRUMP: "No, the other one."

ADAMS: "What other one?"

CRUMP: "Kills about 30 million people at one time, about a pound of it. It's caused from dead food."

ADAMS: "Oh, botulism."

17. On 09/19/2011, the Centers for Disease Control (CDC) advised that CRUMP worked at the CDC in the past for a contractor doing "maintenance type services" at CDC.

18. On 09/29/2011, the United States Department of Agriculture (USDA) verified that ADAMS used to work for a USDA agency called the Agricultural Research Service as a lab technician.

19. On 10/01/11 CHS1, CHS1 consensually recorded a meeting at ADAMS' residence located at 558 Lakeside Road, Toccoa, Georgia. Attendees included THOMAS, ROBERTS, ADAMS, and others. CHS1 reported that ADAMS gave meeting participants a tour of his living quarters. CHS1 described the living quarters as a cabin that included living and eating areas and a travel trailer behind the main cabin. CHS1 also reported that there were two other out buildings that appeared to be car ports that were enclosed on three sides. During the tour of the living quarters CHS1 observed laboratory equipment on the mantle in the main living

area, and described the equipment as having a metal pole on a stand with several arms extending from the center, attached to three of the arms was a condensing coil, y-clamp and funnel with a spigot.

20. On 10/06/2011 CHS1 consensually recorded a meeting with CRUMP and asked about his plans to make and or use ricin. CRUMP told CHS1, "I'll bring ya some seed (reference to castor beans)," and then explained that the items needed to make ricin are castor beans, acetone, lye, and a mixer. CRUMP also explained that when searching for or purchasing materials to make this substance (ricin), a person should buy the materials at different locations and away from where the person lives. CRUMP also warned against searching for or purchasing such materials over the internet because it could be tracked. CRUMP made the following additional comments regarding making ricin:

a. "Can't find the Red Devil lye to put in it. It takes lye."

b. "Gotta have acetone, a mixer."

c. "But ya gotta get it (acetone) in the can. I can buy quarts at Tractor Supply."

d. "When ya soak it (castor bean), that lye takes the hull off the seeds. Then ya take the seeds up (unintelligible). Then one ounce of seed to 2 ½ maybe 3 ounces of acetone. All that

acetone is is your drying compound. Once you put in a blender, keep blendin' it up, it's gonna come out like baby powder. But now ya gotta be careful of that shit."

e. "It's (ricin) gotta be put in a jar after it comes out of the blender. Ya can't handle that shit with your bare hands. Ya got to have gloves."

f. "There's no cure for it (ricin) once it gets into your lungs. You're gone. You can kiss it goodbye.

g. "If it (ricin) gets on your skin, it soaks into your skin, you're gone. This damn stuff is dangerous."

h. "If you're gonna do this (unintelligible), it's gotta be built, a hood. There can be no air, can't be no disturbance."

i. "I can get ya seed (castor beans). I know where the seeds is at right now."

j. "We gonna build us a hood."

k. "It's gonna be in a building in a controlled atmosphere. We'll have a (exhaust) fan."

21. CRUMP also made the following comments regarding dispersing ricin:

a. "You take a pound of that (unintelligible), get upwind, up around Washington, DC, get about 20,000 feet (in an airplane), and turn that shit loose, it'd cover the whole (unintelligible) of Washington."

b. "That stuff's gotta be, charcoal put in it, turn it black so it can't be detected, and it's gonna be white when it comes out, and if you got a way to release it up under your car, that stuff blows out, cameras gonna pick it up . . . If it's black, it's gonna be hard as hell to detect."

c. "Ya get behind a damn, or beside a tractor and trailer, pull your string, open up your lid, it comes out the back. Gotta make sure your heater's on in your car, full blast."

d. "But if we's on the upper end (Washington, DC beltway), the wind's blowin' that way, start puttin' it out, come on around, go around, and that's still blowin' that way."

e. "Halfway ya got a pipe comin' out of the exhaust . . . be like dual exhaust on a damn vehicle; they'd never know it."

f. "Run another pipe from inside the back seat, throw that stuff in there, get where you're goin', just have, uh, something where you can release it down that tube right out the back."

g. "Just think, put all that shit out, and it starts goin' towards Washington, peoples starts kicking the bucket like that, you're talking about a red flag buddy."

22. CRUMP also made the following comments about how to act if they did make ricin:

a. "Everything that's been made around it would have to be destroyed before ya even start."

b. "If you don't admit nothin' they can't prove (unintelligible), but if they find that shit on your computer, you're hung."

c. "If you got anything on that computer that you been huntin', they take that hard drive out."

d. "But ya gotta get rid of it. Ya know, I'm just tellin' ya all that in case we do get started, I'm ready for it."

e. "Just say, me and you went ahead got hold of some of that (ricin), we went and put it out, we ain't got no friends."

23. CRUMP also made the following comments about botulism, suggesting to CHS1 that if they could get the financial backing, they could go to Africa and acquire the material to make botulism:

a. "Well, I thought you can't make that botulism (unintelligible) got some good backers (unintelligible) go to Africa and, uh, get some of that to make."

b. "We'd bring it back over here. Ya don't make it over there. You just get the samples of the stuff out of the soil. It comes from, um, it comes from dead animals, rotten meat. That's where botulism comes from. It's more potent than the stuff (ricin)

. . . I know somebody can make it."

24. On 10/15/2011, CHS1 consensually recorded a meeting at

ADAMS' residence located at 558 Lakeside Road, Toccoa, Georgia. Attendees included THOMAS, ROBERTS, CRUMP, ADAMS, and others. CHS1 reported that ADAMS gave meeting participants a tour of his living quarters and CHS1 observed laboratory equipment, specifically a glass beaker in the main residence, during the tour. Also CHS1 reported that ADAMS showed meeting participants plaques and awards from his employment with the United States Department of Agriculture. During that meeting, CHS1 observed ADAMS take a bean from a storage container located in a car port type structure outside ADAMS house. ADAMS gave the bean to CRUMP who in turn gave the bean to CHS1. CRUMP indicated that the bean was a castor bean. CHS1 described the storage container as approximately 2 feet by 1 ½ feet by 10 inches, and as being about ¼ full of the beans. Also during the meeting, the following conversation occurred between CHS1 and CRUMP:

CHS1: "When ya wanna do it?"

CRUMP: "Oh, we gonna do it. 'Bout you?"

CHS1 "Oh no, not me."

CRUMP: "Well now. (unintelligible)

CHS1 "Let me know if ya need me to get anything."

CRUMP: (unintelligible) "Gotta build a hood."

CHS1: "Okay."

CRUMP: "Uh, and a filter up here with a blower in it to pull

everything out, cause everything gotta go through the opening on the hood, gotta come out this way."

CHS1: "Yea, okay."

CRUMP: "Gotta have gloves all the way up to here, a mask."

The following conversation also occurred at the meeting:

CRUMP: "It's extremely dangerous."

CHS1: "Okay."

CRUMP: "I wouldn't do it by myself, but they the one's that know how to do it. When we get ready to do it, I'll holler at ya."

Also during the meeting, ADAMS made the following statements to CHS1:

ADAMS: "Well I've never done it (made ricin), but I have laboratory experience, and once you extract that stuff enough, just splashin it on your skin can kill ya."

ADAMS: "Once it dries(UI), while it's wet, any kind of solvent like, anything, it just takes water solution to soak through your skin. It's highly permeable through the skin. There's no antidote."

ADAMS: "I've handled all kinds of deadly stuff, pesticides and that kind of stuff, so . . ."

25. On 10/20/2011, the Georgia Public Health Laboratory

reported that the bean provided to CHS1 by ADAMS and CRUMP was verified to be a castor bean by a DNA test, and the bean tested positive for ricin.

26. On October 29, 2011, CHS1 reported to agents his meeting with ADAMS at ADAMS's residence located at 558 Lakeside Road, Toccoa, Georgia, 30577. During the meeting, CHS1 told ADAMS that he spoke with CRUMP about sodium hydroxide (lye). ADAMS told CHS1 how to use lye to remove the bean (castor bean) shell. ADAMS also told CHS1 that the shell did not need to be removed and that grinding them whole increased quantity of ground up bean. CHS1 observed ADAMS reach under his desk in the main residence and remove a metal cash box that contained personal papers. CHS1 observed ADAMS remove two pieces of paper. The first piece of paper contained a list of various poisons, descriptions and effects. The first poison listed was botulism. The other paper contained a detailed recipe for making ricin and the top of the paper contained the words "you make this and you die in four days." CHS1 told ADAMS that he had found a source for the sodium hydroxide (lye) and would be willing to purchase the chemical. ADAMS stated that he needed a pound of lye and that he planned on making his own lye by leaching it from wood ashes to make his ricin.

27. ADAMS has been observed driving a Gray 1996 Buick



Century, license plate Georgia BJD6115, which is registered to ADAMS at his residence of 558 Lakeside Drive, Toccoa, Georgia.

28. CRUMP has maintained contact with the other group members through use of his cellular telephone.

**Reliability of the Source of Information**

29. During the course of the investigation of ROBERTS, THOMAS and others affiliated with the covert group, the FBI as utilized to confidential human sources. The credibility of CHS1 has been demonstrated by the sources' accurate recounting of the conversations the source recorded during meetings with CRUMP, ADAMS and others, when compared to the audio and video recordings of the meetings and physical surveillance of those meetings conducted by law enforcement agents. Law enforcement agents assisting with the instant investigation have listened to and/or viewed consensually recorded telephone calls and video recordings.

30. CHS1 is currently on bond for pending felony state charges. The FBI administered a polygraph test to CHS1 during the investigation of a militia group. The FBI polygrapher determined that CHS1 gave less than truthful responses concerning the activities of the militia group.

**CONCLUSION**

31. Based on the aforementioned factual information, your

affiant respectfully submits that that there is probable cause to believe that there is now concealed evidence, as described in detail in Attachment B, of evidence of the commission of criminal offenses, namely, violation of Title 18 United States Code Section 175, Prohibitions with respect to biological weapons is located in the residence more fully described in paragraph 3 and Attachment A, and this evidence, listed in Attachment B to this affidavit, which is incorporated herein by reference, is contraband, the fruits of crime, or things otherwise criminally possessed, or property which is or has been used as the means of committing the foregoing offenses.

32. Based on the aforementioned factual information, your affiant also respectfully submits that there is probable cause to believe that CRUMP and ADAMS aided and abetted each other in the knowing attempt to produce and possess the biological toxin, ricin, for use as a weapon in violation of Title 18, United State Code, Sections 175(a) and 2.

33. Finally, because of the ongoing nature of the investigation, and to ensure the safety of the confidential source and law enforcement officers involved, I request that the search warrant, application, complaint, arrest warrant and affidavit in support thereof, be SEALED until further order of this Court.