

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA

UNITED STATES OF AMERICA

v.

RYAN ANTHONY SCHALLENBERGER

2008 APR 23 5 20 PM
CRIMINAL COMPLAINT

CASE NUMBER: 4:08-mj-381

(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.

On or about April 19, 2008 in Chesterfield County, in the District of South Carolina, the defendant(s) did: Track Statutory Language of Offense.

attempt to damage and destroy by means of fire and an explosive any building and real property owned or leased by any institution receiving federal funds from the United States government; and did knowingly receive in interstate commerce any explosive with the knowledge and intent that it would be used to kill, injure, and intimidate any individual and unlawfully damage and destroy any building and real and person property; and did attempt to use a weapon of mass destruction against any person and property within the United States, and the mail and any facility of interstate commerce is used in furtherance of the offense.

in violation of Title 18, United States Code, Sections(s) 844(f)(1), 844(d), and 2332a(a)(2)(A).

I further state that I am a(n) Special Agent with ATF and that this complaint is based on the following facts:
Official Title

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof: Yes No

Adam C. Trammell
Signature of Complainant

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE,

April 22, 2008 at Florence, South Carolina
Date City and State

Thomas E. Rogers, III, United States Magistrate Judge
Name & Title of Judicial Officer Signature of Judicial Officer

[Handwritten Signature]

AFFIDAVITJULY 11, 2008
COLUMBIA, SC

I, Alan Craig Townsend, being duly sworn, depose and state that:

2008 APR 22 10 28 03

I am a Special Agent with the United States Department of Justice Bureau of Alcohol, Tobacco, Firearms & Explosives and have been so employed since 2001. I have been in law enforcement since 1994.

As a result of my training and experience as an ATF Special Agent, I am familiar with the federal criminal laws and know that it is a violation of Title 18, United States Code, Section 844(f)(1) for any person to attempt to damage and destroy by means of fire and an explosive any building and real property owned or leased by any institution receiving federal funds from the United States government. Furthermore, it is a violation of Title 18, United States Code, Section 844(d) for any person to knowingly receive in interstate commerce any explosive, as defined by Title 18, United States Code, Section 844(j), with the knowledge and intent that it will be used to kill, injure, and intimidate any individual and unlawfully damage and destroy any building and real and personal property. Moreover, I am aware that it is a violation of title 18, United States Code, Section 2332a(a)(2)(A) for any person to attempt to use a weapon of mass destruction, as defined by Title 18, United States Code, Section 2332a(c)(2)(A), against any person and property within the United States, and the mail and any facility of interstate commerce is used in furtherance of the offense.

I received the following information either through my own investigation or through my conversations with local law enforcement:

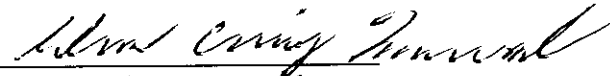
On April 19, 2008, Ryan Schallenberger's (hereinafter referred to as "Ryan") step-father called law enforcement in Chesterfield County, South Carolina, and informed them that Ryan, whom he and Ryan's mother had kicked out of the house two days earlier for violent and inappropriate conduct, had received a shipment of ammonium nitrate in the United States mail. The Schallenbergers turned the ammonium nitrate over to law enforcement as well as papers and an audiotape they had taken from Ryan's room. The package containing the ammonium nitrate was mailed to Ryan Schallenberger from Kentucky. The ammonium nitrate weighed approximately twenty pounds. It is known to law enforcement that ammonium nitrate can be used as a component of a powerful explosive and was the primary ingredient in the Oklahoma City bombing on April 19, 1995. The tape and paperwork given to law enforcement contained homicidal and suicidal messages which appeared to have been intended for publication after a bombing and shooting rampage had occurred at Chesterfield High School.

The Schallenbergers gave officers consent to search the residence. Officer's seized Ryan's diary and other documents detailing a year-long plot to make and test explosive devices and

a plan to carry out the attack referenced in the tape. Law enforcement believes that Ryan had all of the necessary materials and intent to carry out his plan. After waiving his Miranda rights, Ryan admitted to law enforcement that he had already made two to four pipe bombs.

At all times material to this Complaint, Chesterfield High School received Federal financial assistance.

Assistant United States Attorney Rose Mary Parham has reviewed this affidavit.


Alan Craig Townsend
ATF Special Agent

Sworn to and subscribed before me this the 22 day of April, 2008.


~~UNITED STATES MAGISTRATE JUDGE~~