

United States District Court

SOUTHERN

DISTRICT OF

FLORIDA

UNITED STATES OF AMERICA

v.

CRIMINAL COMPLAINT

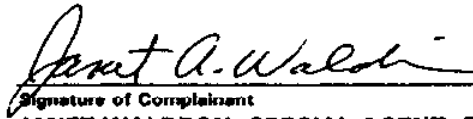
STEPHEN JOHN JORDI

CASE NUMBER: 03-3397-350

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. From on or about August 17, 2003, through on or about November 11, 2003, at Broward and Miami-Dade Counties, in the Southern District of Florida, and elsewhere, the defendant, STEPHEN JOHN JORDI did knowingly distribute by any means information pertaining to the manufacture and use of an explosive device, with the intent that the information be used for, and in furtherance of, an activity that constitutes a federal crime of violence, namely, arson, in violation of Title 18, United States Code, Section 844(l), all in violation of Title 18, United States Code, Section 842(p)(2)(A); and, with the intent that another individual engage in conduct constituting a felony that has as an element the use, attempted use and threatened use of physical force against the property of another in violation of the laws of the United States, and under circumstances strongly corroborative of that intent, did knowingly and willfully solicit, command, induce, and otherwise endeavor to persuade such person to engage in such conduct, that is, arson, in violation of Title 18, United States Code, Section 844(i), all in violation of Title 18, United States Code, Section 373; and did knowingly receive and possess a firearm, that is, a silencer, which firearm was not registered to him in the National Firearms Registration and Transfer Record, as required by Title 26, United States Code, Sections 5841 and 5845(a), all in violation of Title 26, United States Code, Sections 5861(d) and 5871.

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT



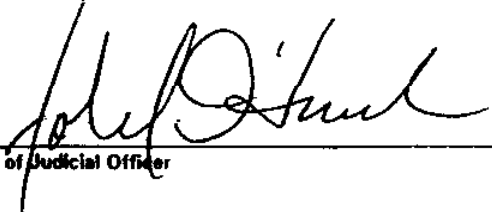
Signature of Complainant
JANET WALDRON, SPECIAL AGENT, FBI
 NOVEMBER 12, 2003

Sworn to before me, and subscribed in my presence,

November 12, 2003
 Date

at Miami, Florida
 City and State

JOHN J. O'SULLIVAN
 United States Magistrate Judge
 Name and Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT

I, Janet Waldron, being duly sworn, depose and state the following:

1. I am a Special Agent with the Federal Bureau of Investigation, assigned to the FBI Joint Terrorism Task Force ("JTTF"). As such, I am responsible for counterterrorism investigations involving violations of federal laws pertaining to domestic and foreign terrorism. This affidavit is in support of a criminal complaint charging STEPHEN JOHN JORDI with solicitation to commit a crime of violence, that is, arson, in violation of Title 18, United States Code, Section 844(i); all in violation of Title 18, United States Code, Section 373; distribution of information relating to the manufacture and use of explosives and destructive devices with the intent that the information be used for, and in furtherance of, a federal crime of violence, that is, arson, in violation of Title 18, United States Code, Section 844(i); all in violation of Title 18, United States Code, Section 842(p); and possession of an unregistered firearm/destructive device, in violation of Title 26, United States Code, Section 5861(d). The facts set forth herein are intended to present information in support of a probable cause determination for a criminal complaint, and do not reflect all of my knowledge concerning the instant offenses. The information set forth below contains first-hand knowledge from my participation in this investigation, as well as observations and facts provided to me by cooperating witnesses and other law enforcement officers during the investigation.

2. A portion of the information contained herein has been provided by a Cooperating Witness, (CW). This CW has been providing information to the Federal Bureau of Investigation (FBI) since approximately the early 1990's. The information and assistance provided by the CW over the years has resulted in the arrest of numerous individuals for federal felony offenses, and the CW has been paid for his assistance to the FBI. The CW has never provided information to your

affiant that has proven to be untruthful.

3. In mid-August, 2003, FBI Joint Terrorism Task Force agents received a tip from a caller regarding STEPHEN JOHN JORDI. The caller was an individual who has known JORDI for many, many years. The caller advised FBI that JORDI had recently made statements to various individuals that he (JORDI) desired to bomb abortion clinics. Subsequent interview of a second individual who had recently spoken with JORDI revealed that JORDI also stated that he (JORDI) had been writing to Paul Hill (who was then on Florida's death row for the murder of an abortion doctor and the doctor's bodyguard), and that he (JORDI) was unhappy with the recent capture of accused abortion clinic bomber Eric Rudolph. This second individual further stated that JORDI expressed a desire to be "on the run" like Rudolph, and explained that he (JORDI) knew how to make napalm out of gasoline and styrofoam. FBI agents verified JORDI's address through physical surveillance and records checks as 6800 N.W. 39 Avenue, Lot 270, Coconut Creek, Florida.

4. In an effort to verify whether JORDI intended to bomb abortion clinics, FBI endeavored to introduce the CW to JORDI. The CW and JORDI met on August 17, 2003 at a church service in Pompano Beach, Florida, when JORDI approached the CW and struck up a relationship in which JORDI openly began discussing his anti-abortion views, and quickly stated his belief that bombing clinics is an appropriate counter-measure to save unborn babies. The CW and JORDI then began meeting on almost a weekly basis, with the CW professing sympathy for JORDI's expressed views that violence against abortion clinics, abortion doctors, apostate churches, and "fag bars" is necessary and sanctioned by the Bible. The CW assumed the role of an ex-police officer with strong anti-abortion and anti-homosexual sentiments.

5. On August 17, 2003, JORDI and the CW met at a Denny's Restaurant located at 1250

West Hillsboro Blvd., Deerfield Beach, Florida. During the tape recorded meeting, JORDI began discussing his “possible” plans to blow up abortion clinics, apostate churches (an apparent reference to churches that JORDI feels do not do enough to prevent abortion), and “fag bars.” JORDI stated to the CW that he (JORDI) “would put my own life and my family’s lives at risk to save an unborn baby.” Among JORDI’s remarks during the conversation were the following:

– “I don’t have the means to kill abortion doctors, but I do have the means to bomb clinics. Maybe that way I can dissuade other doctors from performing abortions.”

– “If I do this, my wife knows I can never come home . . . I’ll be a fugitive on the run . . . she doesn’t like it, but she understands . . . if I start blowing up clinics, I’ll be a hunted man.”

– “[abortion clinics] are the same as the holocaust – where millions of Jews were killed.”

– “we now applaud those who acted, who hid Jews in their attics . . . we may also be considered heroes some day”

– “I don’t care if I’m popular . . . I am not afraid of the electric chair . . . I hope they tape my eyeballs, though.”

JORDI further discussed with the CW his (JORDI’s) knowledge of making homemade napalm for firebombs, and discussed how he needs to acquire chemical components to make homemade “C-4” (plastic explosive), and stated that he lacked familiarity with timing devices but needed to set something up to allow him twenty minutes or so to “get away.” JORDI told the CW that he (JORDI) had ordered books on the internet on improvised explosive making to further his plans. JORDI also expressed admiration for Eric Rudolph, the abortion clinic and Atlanta-Olympics bombing suspect.

6. In another tape recorded meeting at Miami Beach, Florida on August 18, 2003, JORDI told the CW that he (JORDI) had been trying to acquire a military book on improvised weaponry. JORDI told the CW that he (JORDI) had also been communicating with Paul Hill, the convicted

abortion doctor murderer then on death row and awaiting execution, whom JORDI described as a "known terrorist." JORDI stated in this meeting that he (JORDI) had planned to take two years to study and pray "... before I move on ... do not want to act too suddenly or too hastily." When asked by the CW if he had yet looked at any clinics in his area, JORDI further stated that

no ... in fact I've had a couple of people suggest some, they said there's one in Delray, they don't have a security guard you know, cause they can't afford it. Why don't you go blow up that place? I said cause I'm not done studying ... I have to make sure its legitimate by my pastor and by myself ... when I come to a place, have to be aware of the building, surroundings, security, the argon fire suppression system, so if you go in there and light off a bomb, or ah ... or a primitive means of ... my guy gave me the - the ah ... the formula for napalm.

During this meeting, JORDI discussed the possibility of using C-4 plastic explosive, propane tank bombs or pipe bombs as explosive devices, and stated that he had ordered over the internet a book known for its "prolific terrorist ties" and had visited the "Army of God" website. The CW noted that "from the conversation we had last night, I thought you wanted to do this together" to which JORDI replied "if you can be of substantial assistance, yes." JORDI told the CW in this meeting that if he (JORDI) sticks to small-town areas with small police forces he can hit three abortion clinics and three "fag bars," yet the police will be unable to catch him, as such police departments are undermanned and have slow response times. JORDI went on to say that the FBI would get involved, "as long as I keep hitting places ... they'll keep after me ... but like trying to catch a cockroach in a house ... they won't get me." JORDI stated that "they" already know me, a former Army Ranger, with the know-how to kill people, familiar with the woods. FBI has independently verified that STEPHEN JOHN JORDI served in the United States Army.

JORDI further stated that he did not want to endanger his own family, and that after he begins

the bombing spree

if I come home, I already told my wife, if I come home, you're gonna turn me in. . . I'm not gonna have her aiding and abetting a worldwide known terrorist blowing up faggots and abortion clinics and whatever else, not, including churches. I might go out and blow up a couple, ah . . . apostate churches too.

JORDI added that he does not want to hit any local targets, and will instead look north. He added further that "I will never see a state jail, . . . it'll definitely be federal, because when I do this, I'm disappearing off the face of the earth . . ." JORDI told the CW that he (JORDI) already had anticipated that the CW would want a list of things and had therefore prepared a shopping list, or "wish list" of items needed to carry out the plan. JORDI went on to ask the CW if he (CW) could help him in his plan to blow up clinics by obtaining ballistic gear, including bulletproof vests, boots and pants. JORDI stated that he keeps shortening his list as "the more knowledge I get, the less gear I have to carry." When asked what kind of weapons he needed, JORDI responded that he needed extendible, collapsible batons, and "probably something like ah . . . Beretta nine millimeter, uhm . . . with ah . . . a collapsible, detachable silencer, maybe, probably not, given the price, and how illegal it is -- if its on my gear and I get caught, I'm in a whole lot of trouble . . ." During this meeting, JORDI provided the CW with the handwritten "wish list" of materials needed for the planned abortion clinic bombing spree. The list included references to a "survival course," improvised explosives books, batons, a nine millimeter pistol, water filter, knife, "cuff key," mace, and ended with a note that "is any of this illegal or somehow incriminating -- if so I'll avoid til ready to act."

7. On August 25, 2003 and August 28, 2003, JORDI and the CW surveilled several South Florida abortion clinics in order to examine security and escape routes after a possible bomb/arson

attack. These surveillances were videotaped and the conversations between JORDI and the CW were tape recorded. Security at the clinics and possible entry points for explosives, dynamite, or flammable liquids were discussed by JORDI and the CW during these surveillances.

8. On September 3, 2003, the CW and JORDI attended the demonstration against the execution of Paul Hill outside the Florida State Prison at Starke, Florida. At that event, JORDI was photographed by the New York Times walking alongside convicted abortion clinic bomber Joshua Graff. JORDI is also seen in the same photograph walking behind Neal Horsley, a key player in the "Army of God," an underground network of persons who believe that the use of violence is appropriate and acceptable as a means to end abortion. Horsley hosts the Nuremberg Files website (www.christiangallery.com) where he posts the names and personal information of abortion providers as well as photos of people entering abortion clinics. The website has been called a "hit list" for abortion clinics and providers.

Telephone records indicate that JORDI was in telephonic contact with telephone number (770) 214-0126 on September 21, 2003 twice, and on October 2, 2003, six times. A search on Lexis and Yahoo! by FBI agents revealed that this telephone number is associated with Neal Horsley.

9. On September 10, 2003, JTTF agents did a "trash pull" at JORDI's residence and obtained trash from a bag left outside for pickup. Inside the trash they recovered a receipt indicating the purchase from Territorial Armory of the following items for the indicated prices: -

- Anarchist Arsenal	\$30.00
- Improvised Munitions - Black Book	\$17.95
- Improvised Munitions - TM 31-210	\$6.95
Shipping	<u>\$5.00</u>
	\$59.90

10. On September 23, 2003, at Miami Beach, Florida, JORDI met with the CW and provided

the CW with several books on improvised explosive devices, including the "The Anarchist Arsenal – Improvised Incendiary and Explosive Techniques," "Improvised Munitions – Black Book," and "Improvised Munitions Handbook – TM 31-210." This meeting was audio and videotaped. JORDI had highlighted certain sections of the books, including passages that gave recipes and instructions for making homemade plastic explosives, improvised black powder, nitric acid-based explosives, fertilizer-based explosives and methyl nitrate dynamite.

During this meeting JORDI told the CW that he (JORDI) has been studying a lot of methods. JORDI stated that they would not use high-tech explosives "until we get things routine." He told the CW that "we might be sloppy at the beginning" and that he wants to hit approximately 12 clinics with gasoline first, "low tech" so that "if we get caught there's less time in jail." JORDI and the CW discussed JORDI's research materials (the above-referenced munitions/explosives books) and JORDI stated "is this contraband?" The CW answered, "no, you can buy them anywhere, can't you?" The CW further noted that "they (the books) have got the stuff, the gasoline in it you're talking about." A few minutes later, JORDI told the CW that "I highlighted the chemical components that are easiest to assemble within reason, cause if I have to go to a chemical supply warehouse it can be traced too easy."

JORDI also mentioned during this meeting that he had spoken with the Army of God, specifically with Joshua Graff. JORDI told the CW that Graff had told him (JORDI) that he (JORDI) should "break off" and go "lone ranger" because any partners in his plan could get him arrested. The CW kept the books and provided them to FBI for photocopying before returning them to JORDI.

11. On October 7, 2003, JORDI met with the CW in a tape recorded meeting at Miami

Beach, Florida, and told the CW that one day Paul Hill will be recognized for "who he really was." JORDI showed the CW a letter received by JORDI from Paul Hill in July, 2003, thanking JORDI for his moral and financial support. The CW kept the letter overnight and FBI thus has obtained a copy of the letter. In the letter Hill noted that JORDI's previous letter to Hill had asked whether Hill had any "doubts" about his (Hill's) actions. Hill replied that he did not doubt the righteousness of his actions. JORDI after discussing the letter with the CW said "I told my wife when I get to prison she needs to save all of my letters." JORDI then discussed a typewritten list that he provided to the CW during this same meeting regarding things and/or training that JORDI needed in order to accomplish his goals. This list, titled "AOG EQUIPMENT," (an apparent reference to "Army of God") followed up the handwritten list (referenced in paragraph 6 above) that JORDI had previously provided to the CW. JORDI stated that he wrote on this list that dynamite was needed "to blow up stumps," then laughed and said he had written it that way in case the list ever fell into "the wrong hands." JORDI further discussed Molotov cocktails in some detail during this meeting and instructed the CW how to make a Molotov cocktail. JORDI described the easiest method of constructing a Molotov cocktail, and also described other mixtures to create stickier and hotter Molotov cocktails, as well as different ignition systems.

12. On October 8, 2003, JORDI and the CW again met at Miami Beach, Florida and had a tape recorded and videotaped conversation. The CW returned to JORDI his (JORDI's) letter from Paul Hill. During this meeting, JORDI discussed how much dynamite was needed to blow up a clinic, and also told the CW that he (JORDI) wished to kill President Bush or former President Clinton.

13. On October 15, 2003, JORDI again met with the CW at Miami Beach, Florida and had

a tape recorded and videotaped conversation. During this meeting, the CW tried to dissuade JORDI from the idea of killing the president. The CW and JORDI had a lengthy discussion about bombing abortion clinics. After discussing JORDI's plans to provide for his wife and children while on the run, JORDI added that

They're gonna be changing my diapers in jail I promise you that. They won't be changing my diapers in a nursing home. They'll be changing my diapers in jail. . . (UI) . . . my dental work and everything. I'm gonna do this. . . I will not plead insanity nor will I allow my lawyer to plead insanity . . . I would fire my lawyer.

The CW told JORDI that he needed to get some sleep, to which JORDI replied "No, I need to go bomb a place."

14. On October 27, 2003 JORDI and the CW met at Miami Beach, Florida. During this tape recorded meeting, both JORDI and the CW swore on a bible before JORDI's wife that neither was a "fed."

15. On November 5, 2003 JORDI and the CW met at the Denny's Restaurant at 1250 West Hillsboro Boulevard, Deerfield Beach, Florida. During this meeting, which was tape recorded, JORDI discussed with the CW a plan to drop off his wife and children with relatives in Pensacola, Florida after his wife gives birth to their child, then due on November 8, 2003. JORDI also discussed with the CW bombing an abortion clinic in Macon, Georgia as a part of the bombing spree.

16. On November 11, 2003, JORDI and the CW met at the Denny's Restaurant on 1250 West Hillsboro Boulevard, Deerfield Beach, Florida. JORDI drove the CW throughout the day to various locations in his (JORDI's) 1988 Ford Aerostar van, and the CW wore a concealed recording device to tape record his conversations with JORDI. JTTF surveillance teams also followed the two throughout the day, videotaping and photographing some portions of the surveillance. Shortly before

12:00 p.m, JORDI and the CW traveled to a Home Depot store at 60 S.W. 12 Avenue, Deerfield Beach, Florida. They were later observed departing the store with two five gallon gasoline cans. It was later determined that they also purchased gloves at the store.

After departing the Home Depot store, JORDI drove to an auto parts store, where he and the CW purchased flares and starter fluid. Later, they traveled to Outdoor World in Dania, Florida, where they purchased small propane tanks. Shortly after 3:00 p.m., they traveled to a Home Depot store at 3401 Oakwood Boulevard, Hollywood, Florida, and purchased a large propane tank filled with propane gas. During the day, JORDI and the CW also visited a Radio Shack and a locksmith shop.

17. Later in the afternoon of November 11, 2003, JORDI and the CW traveled to Miami Beach, Florida. They were surveilled as they stopped at approximately 3:54 p.m. at a Shell gas station at Alton Road and 17th Street, where together they filled up the two gasoline cans. They subsequently stopped at a Publix store and a bank in order to obtain money from JORDI's account to purchase a silencer and pistol. JORDI had mentioned that he needed a silencer initially on August 18, 2003 (see paragraph 6, above), and had discussed obtaining a silencer on at least one occasion in subsequent meetings with the CW. The CW informed JORDI that he (CW) had been expecting a friend to bring a silencer, as JORDI had expressed interest in obtaining one for use in the plan to bomb and possibly to shoot into clinics.

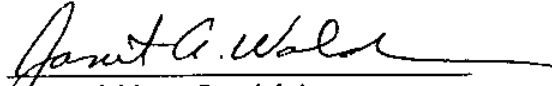
Upon arriving at the CW's home at a Miami Beach marina, the CW provided JORDI with a Springfield .45 caliber pistol with an attached silencer and two empty magazines. JORDI held the weapon in his hands and examined it, and removed the detachable silencer. JORDI later paid \$200 to the CW for the pistol and silencer. The transaction and the counting of money could be heard by

the JTTF surveillance agents. The CW wrote JORDI a receipt for the silencer, but wrote on the receipt that it was for ballistic gear, not for a pistol and silencer.


A short while after completing the pistol and silencer transaction, the CW departed his residence and JTTF agents approached JORDI and announced that he was under arrest. With weapons pointed at him and agents approaching, JORDI put his hands up, threw his combination cellular telephone and PDA (personal digital assistant) into the water in the marina, and then jumped into the water himself in an effort to avoid arrest. It took approximately 45 minutes to capture JORDI as he eluded the federal agents, police and Coast Guard in the water by swimming around the marina and hiding underneath the docks and boats in the marina.

18. Bureau of Alcohol, Tobacco & Firearms (ATF) agent Matthew May, assigned to the JTTF, has notified your affiant that a check with the National Firearms Registration and Transfer Record on November 12, 2003, indicates that no firearms are registered therein to the defendant STEPHEN JOHN JORDI.

FURTHER AFFIANT SAYETH NAUGHT


Janet Waldron, Special Agent
Federal Bureau of Investigation

Sworn and subscribed before
me this 12 day of November, 2003.


JOHN J. O'SULLIVAN
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF FLORIDA