



1 **AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

2 I, Michael P. Eldridge, hereafter referred to as affiant, duly sworn under oath, hereby depose and  
3 state as follows:

4 1. I make this affidavit in support of a complaint for the issuance of an arrest warrant for  
5 Ryan Kelly Chamberlain, II (CHAMBERLAIN).

6 2. As set forth below, there is probable cause to believe that CHAMBERLAIN has  
7 committed a violation of Title 26 U.S.C. § 5861(c) (possession of an illegal destructive device). I am a  
8 Special Agent with the Federal Bureau of Investigation ("FBI"), and have been so employed since July  
9 2013. I am currently assigned to the FBI's San Francisco Division, Oakland Resident Agency  
10 ("Oakland RA"). The Oakland RA is tasked with the investigation of federal criminal offenses,  
11 including the investigation of weapons of mass destruction ("WMD"), which comprise, in part,  
12 biological agents, toxins, explosive devices, and related materials. This application arises from a joint  
13 investigation by the FBI, the Bureau of Alcohol, Tobacco, Firearms, and Explosives, and the United  
14 States Department of Homeland Security, Homeland Security Investigations, of CHAMBERLAIN.

15 3. I have personally participated in this investigation and am aware of the facts contained  
16 herein based on my own investigation, as well as my review of documents, records and information  
17 provided to me by other law enforcement officers and technical experts. The other law enforcement  
18 officers and experts I have received information from include FBI special agents with training and  
19 experience in WMD related investigations. These special agents have received specialized training in  
20 WMD investigations and have conducted investigations concerning the production and manufacturing of  
21 WMDs, as well as multiple assessments and investigations of the threatened use of WMDs. Based on  
22 my personal knowledge, and the information I have received from the law enforcement officers and  
23 technical experts described above, I have knowledge, training, and experience regarding the  
24 manufacture, deployment, and manufacturing of WMDs.

25 4. This affidavit is intended to show that there is sufficient probable cause for the requested  
26 criminal complaint and does not set forth all of my knowledge about this matter. Unless specifically  
27 indicated, all conversations and statements described in this affidavit are related in substance and in part.

1 Where I assert that an event took place on a particular date, I am asserting that it took place on or about  
2 the date asserted.

3 5. On May 30, 2014, United States Magistrate Judge Jacqueline Scott Corley signed a  
4 search warrant authorizing the search of 1831 Polk Street #117, San Francisco, California (the **Subject**  
5 **Premises**), the suspected residence of CHAMBERLAIN. (See Search Warrant attached as Exhibit A  
6 and incorporated as if fully set forth herein). Based on your affiant's investigation, CHAMBERLAIN  
7 was believed to be the sole resident of the **Subject Premises**.

8 6. On May 31, 2014, your affiant was part of a team of law enforcement personnel that  
9 served the search warrant on the **Subject Premises**. Shortly before the service of the search warrant,  
10 CHAMBERLAIN was observed exiting the **Subject Premises** with an identified female known to reside  
11 at a separate location. CHAMBERLAIN was observed to drive away from the area of the **Subject**  
12 **Premises** with the identified female. Approximately 30 minutes later, CHAMBERLAIN was observed  
13 approaching the **Subject Premises** on foot. Your affiant identified himself to CHAMBERLAIN and  
14 invited CHAMBERLAIN to talk in a nearby coffee shop.

15 7. Inside the coffee shop, CHAMBERLAIN admitted that he was aware of the Tor network,  
16 and that he sometimes played poker on 'black market' websites. He admitted that the laptop he used to  
17 access these sites was inside the **Subject Premises**. After a short interview, CHAMBERLAIN was  
18 allowed to leave the coffee shop at his request. CHAMBERLAIN was thereafter observed to enter his  
19 personal vehicle and drive away from the vicinity of the **Subject Premises**. Attempts to follow  
20 CHAMBERLAIN were curtailed by surveillance teams out of a concern for public safety, when  
21 CHAMBERLAIN was observed driving in an apparent intentionally reckless manner at a high rate of  
22 speed, failing to stop at posted lights and signs. CHAMBERLAIN's whereabouts remain unknown to  
23 your affiant.

24 8. After entry was made into the **Subject Premises** on May 31, 2014, your affiant is aware  
25 that FBI personnel found several items of potential evidentiary interest, including a rust-colored  
26 'messenger' bag or satchel lying on the floor adjacent to the kitchen or dining room table.

1           9.       Per FBI search protocol, an x-ray analysis of the contents of the bag was conducted  
2 before the bag was handled or opened. The x-ray (an image from which is attached as Exhibit B), was  
3 examined by trained FBI bomb technicians with experience in assessing destructive devices as defined  
4 by 26 U.S.C. § 5845(a). These bomb technicians stated to your affiant that the contents of the  
5 messenger bag included the following:

- 6           • A screw top glass jar containing batteries and a powdery, green substance
- 7           • A model rocket motor lodged within the green powdery substance
- 8           • An 'electric match,' a common igniter for improvised explosive devices ("IEDs")
- 9           • An assortment of ball bearings and screws believed to be intended projectiles
- 10          • A wire extending from the glass jar attached to the metal lid of the jar
- 11          • A circuit board, configured as a remote-controlled receiver

12          10.       I am informed by the FBI bomb technicians who analyzed the device that the insertion of  
13 the model rocket motor into the green powdery substance is significant, since rocket motors are known  
14 to 'burn' at extreme temperatures, creating an efficient method of fully igniting explosive material,  
15 which the FBI bomb technicians believe the green powdery substance to be. I am further informed by  
16 these same bomb technicians that the device found within the messenger bag contained the four  
17 components necessary to comprise an IED: 1) a power source; 2) wire conductors; 3) a switching  
18 mechanism; and 4) an initiator/explosive. FBI bomb technicians believe that the circuit board described  
19 above was designed to serve as a remote control, allowing detonation of the device from afar. Based on  
20 this evidence and their collective training and experience, the FBI bomb technicians who analyzed the  
21 contents of the messenger bag believe it to be an illegal destructive device within the meaning of 26  
22 U.S.C. §§ 5845(a) and 5861(c). They further believe that the device was designed to maim or kill a  
23 human being or human beings.

24          11.       Your affiant believes based on the investigation that the messenger bag and contents were  
25 the property of CHAMBERLAIN. The messenger bag itself was found immediately adjacent to the  
26 kitchen or dining room table of the one bedroom apartment. On that table, within approximate arms-  
27 reach of the messenger bag, was an open laptop computer believed by your affiant to be

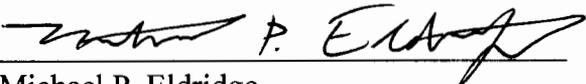
1 CHAMBERLAINS, based on my investigation and statements made by CHAMBERLAIN to your  
2 affiant on May 31, 2014.

3 12. On a shelf in the kitchen of the Subject Premises was what appeared to be a tool box  
4 containing apparent additional IED components similar to those used in the messenger bag device,  
5 including wires and a "clothespin switch," commonly used in assembling IEDs and booby-traps. The  
6 search of the **Subject Premises** confirmed that CHAMBERLAIN was the apparent sole occupant.  
7 Only male clothes were found within the **Subject Premises**.

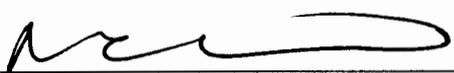
8 **CONCLUSION AND REQUEST FOR SEALING ORDER**

9 13. Based on the foregoing, I request that a criminal complaint issue for CHAMBERLAIN  
10 for a violation of Title 26 U.S.C. § 5861(c) (possession of an illegal destructive device), based on  
11 probable cause as described above in this Affidavit. Based on the on-going nature of this investigation,  
12 and based on the fact that Attachment A to this Affidavit remains under seal based on the order of  
13 United States Magistrate Judge Jacqueline Scott Corley, I request that this Affidavit, request for criminal  
14 complaint, and supporting documents and attachments remain under seal except that it may be shared  
15 with law enforcement personnel engaged in the search for CHAMBERLAIN, and other parties  
16 providing information in support of the search by law enforcement for CHAMBERLAIN.

17 14. Under the penalty of perjury, I swear that the foregoing is true and correct to the best of  
18 my knowledge, information, and belief.

19   
20 Michael P. Eldridge  
21 Special Agent  
22 Federal Bureau of Investigation

23 Subscribed and sworn before me  
24 on June 1, 2014:

25   
26 HONORABLE NATHANAEL COUSINS  
27 UNITED STATES MAGISTRATE JUDGE

28 Approved as to form:   
Philip J. Kearney  
Assistant United States Attorney