

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS  
(Wichita Docket)

All in violation of Title 18, United States Code, Sections 2 & 2332a(a)(2)(D).

---



## **BACKGROUND OF CASE**

7. This investigation began based on reporting from a reliable, paid Confidential Human Source (CHS) who has attended numerous Crusaders meetings where plans were discussed to carry out a violent attack against Muslims (whom the group members refer to as “cockroaches”) in southwestern Kansas. These groups meet in person frequently, as often as once per week, and also engage in frequent communication daily through a telephone application (app) called Zello. Information provided by the CHS has been veris2 (e)6 (1704 Tw 13.57 0 TTda10 ()4 (n )]TJ

have routinely expressed a hatred for Muslims, individuals of Somali descent, and immigrants. They chose the target location based on their hatred of these groups, their perception that these



to put a plan into action. **STEIN** said he wanted to know where they are so they can “kill all of the motherfucking cockroaches.”

16. During an in-





bombs with a cell phone, and they discussed having militia members in different states purchase prepaid cell phones for them so that they could not be traced. The group researched mosque prayer times online to determine when the most people would be around. **WRIGHT** was tasked with ordering glassware in order to make the bombs. **STEIN** was instructed to get a rock tumbler to crush cans into aluminum powder. The CHS was told to do reconnaissance at the complex to look for security cameras and take pictures and such.

with the UCE at a rural location in Finney County, Kansas. The FBI UCE (and other FBI UCEs

device. The UCE agreed to this arrangement and promised to contact **STEIN** in the near future to finalize the plan.

26. On October 11, 2016 at 1633 hours, Liberal Police Department (LPD) was contacted by a female who identified herself as **ALLEN**'s girlfriend at a residence she shares with **ALLEN**, in Liberal, Kansas, regarding a domestic battery. This female advised the LPD dispatcher that she was battered by **ALLEN** during an argument over money and her leaving their residence. S

She saw hydrogen peroxide, fuel tablets and cheesecloth being used for the manufacture of explosives. In addition, she describes the substance being cooled in an ice bath (she stated the substance was so unstable it needs to be produced in a climate controlled environment).

29. Kansas Highway Patrol Technical Trooper Bomb Technician BRODI GOSCH has reviewed statements made by ALLEN's girlfriend and, based on his training and experience, believes them to be consistent with the manufacturing of a homemade explosive known as Hexamethylene Triperoxide Diamine (HMTD). This is known as a primary explosive, very sensitive to heat, shock and friction. This primary explosive presents a significant public safety hazard and is usually used to create homemade blasting caps to initiate a larger explosive.

30. On October 12, 2016 search warrants were conducted at ALLEN's residence and G&G. A possible detonator was found inside G&G. The detonator was believed to be HMTD. Agents also found a black thermometer, bamboo chopsticks with a white substance, Hydro4 (a)-61 (ubs)T04 Tc

**CONCLUSION**

Based on the above information, I respectfully submit that probable cause exists to believe that **Patrick Eugene STEIN, Curtis Wayne ALLEN, and Gavin Wayne WRIGHT** have committed the offense set forth above, and I respectfully request the Court issue warrants for their arrest.

FURTHER AFFIANT SAITH NOT.

***Chad B. Moore***

Chad B. Moore  
FBI Task Force Office

SUBSCRIBED TO AND SWORN before me this the 13th day of October, 2016.

---

HONORABLE JAMES P. O'HARA  
Chief United States Magistrate Judge  
District of Kansas