

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

IN RE THE SEARCH OF:

2002 Red Hyundai bearing  
Maryland tag Redacted registered  
to James Wenneker Von Brunn

)  
)  
)  
)  
)

CRIMINAL NO.

**AFFIDAVIT IN SUPPORT OF SEARCH WARRANT**

I, Ronald Farnsworth, being duly sworn, do hereby state the following.

1. I am a Special Agent with Federal Bureau of Investigation (FBI) assigned to the Washington Field Office. I have been a Special Agent of the FBI since 2003. I have been involved in the investigation of numerous types of offenses against the United States, including domestic terrorism investigations, international terrorism investigations, and violent crime investigations.
2. In the course of conducting and participating in criminal investigations, I have been involved in interviewing and debriefing informants; conducting physical surveillance; and preparing and executing search and arrest warrants. My knowledge of the facts and circumstances contained within this affidavit is based on my personal investigation, as well as reports made to me by other law enforcement agencies, the Washington D.C. Metropolitan Police Department and United States Park Police. The statements contained in this affidavit are based either on my personal knowledge or information obtained from other law enforcement officers. This affidavit does not set forth every fact

discerned throughout the investigation; rather, it contains a summary of the investigation to date and sets forth only those facts that I believe necessary to establish probable cause to search the premises described herein.

3. This affidavit supports an application for a warrant to search a 2002 red Hyundai bearing Maryland license plate number [Redacted] and vehicle identification number

[Redacted]. There exists probable cause to believe that a search of this vehicle will produce evidence and instrumentalities of criminal offenses against the United States, to wit 18 U.S.C. § 1111 (Murder). The facts and circumstances are as follows:

4. On or about June 10, 2009, at approximately 12:50 p.m., a white male (“suspect”) drove up to the front of the United States Holocaust Memorial Museum, located at 100 Raoul Wallenberg Place, S.W., Washington, D.C. 20024. The Holocaust Museum is located on federal property pursuant to 36 U.S.C. § 2301 which states, “The United States Holocaust Memorial Museum is an independent establishment of the United States Government.” Thus, federal government jurisdiction is established pursuant to 18 U.S.C. § 7 (Special maritime and territorial jurisdiction of the United States).
5. The suspect was driving a 2002 red Hyundai bearing Maryland license plate number [Redacted]. The suspect double parked his vehicle facing southbound in the traffic lane. He stepped out of the driver’s side of the vehicle and approached the entrance to the museum. The suspect was carrying a rifle at his side as he approached the building.
6. Steven Tyrone Johns, a Special Police Officer (“SPO”) for the National Holocaust Museum, opened the door for the suspect. The suspect raised his rifle and shot Steven Tyrone Johns in the upper chest area before the SPO had an opportunity to protect himself.
7. Two other Special Police Officers on duty immediately reacted to the shooting and returned

- fire at the suspect. The suspect was shot in the face and fell backwards outside the door.
8. All of these events were captured on videotape. The videotape was viewed by members of the Federal Bureau of Investigation and the Washington D.C. Metropolitan Police Department.
  9. When officers responded to the scene, they found the suspect suffering from a gunshot wound to the face. A .22 caliber rifle was recovered next to the suspect. Officers also recovered a license from the suspect's person. The license bore the name James Wenneker Von Brunn with a date of birth of [Redacted].
  10. Steven Tyronne Johns was rushed to the hospital suffering from a gunshot wound to the upper chest. He succumbed to his injuries and was pronounced dead at approximately 3:08 pm.
  11. Officers responding to the scene secured the 2002 Red Hyundai. Bomb dogs were brought to the scene and indicated a positive hit for the possibility of explosives. Officers did a cursory search of the vehicle for explosives, but did not find any indication of an explosive device.
  12. Further investigation revealed that the vehicle, a 2002 red Hyundai bearing Maryland license plate number [Redacted] and vehicle identification number [Redacted], is registered to James Wenneker Von Brunn, date of birth of [Redacted].
  13. Further investigation of James Wenneker Von Brunn, date of birth of [Redacted], revealed that Von Brunn is a known white supremacist who has espoused hate speech directed specifically towards Jews for an extensive period of time. Specifically, Von Brunn claimed to have written a short novel entitled "Kill the Best Gentiles", which can be found on the website he created [www.holywesternempire.com](http://www.holywesternempire.com). The novel detailed how Von

Brunn believed the government was being run by Jews and the Jews were looking to extinguish the white race.

14. The execution of this warrant is sought in the evening hours in order to promptly investigate all evidence and leads relating to this serious criminal matter. Specifically, law enforcement needs to investigate whether the gunman was working alone and whether additional targets were established. As there are apparent ties to white supremacist groups, law enforcement must assess the potential immediate threat. Moreover, Metropolitan Police Department officers and Federal Bureau of Investigation agents have secured the vehicle, which was left in the middle of a traffic lane.
15. Based on the information contained in this affidavit, probable cause exists to believe that the vehicle registered to James Wencker Von Brunn, date of birth of [Redacted], may contain evidence and instrumentalities of criminal offenses, specifically weapons, ammunition, weapon accessories, trace evidence of any such weapons or ammunition; notes, books, manuals, receipts, maps, address books, or other evidence of targets or surveillance; cellular telephones or other electronic devices, address books, or other forms of communication with possible co-conspirators; any information relating to white supremacy; photographs, car registration, insurance cards, or any information leading to identification; or any other documentary or physical evidence to prove a violation of 18

U.S.C. § 1111 (Murder). Therefore, I respectfully request the issuance of a search warrant for the vehicle described herein.

---

Ronald Farnsworth  
Special Agent, FBI

Sworn to and subscribed to  
before me this \_\_\_\_\_ day  
of June, 2009

---

Honorable Deborah Robinson.  
United States Magistrate Judge