AUSA BRY

OAO91 (Rev. 12/03) Criminal Complaint

U. S. DISTRICT COURT
Eastern District of Louisiana

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF LOUISIANA

FILED DEC 30 2008

LORETTA G. WHYTE
Clerk

UNITED STATES OF AMERICA
V.

GREGORY BROUSSARD

(Name and Address of Defendant)

CRIMINAL COMPLAINT

Case Number: 08-235 MAG

I, the undersigned complainant state that the following is true and correct to the best of my knowledge and belief. On or about December 29, 2008 (Date) in Tangipahoa Parish, in the EASTERN District of LOUISIANA defendant(s) did,

(Track Statutory Language of Offense)

did knowingly and willfully make a threat to take the life of, and to inflict bodily harm upon the President of the United States, specifically, the defendant threatened to kill, United States President George W. Bush,

in violation of Title 18 United States Code, Section(s) 871.

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

SEE ATTACHED AFFIDAVIT.

Fee
Process
X Dktd (3cc usm)
CtRmDep
Doc. No.

Continued on the attached sheet and made a part of this complaint: ☒ Yes ☐ No

Signature of Complainant

Matthew J. Pedersen
Printed Name of Complainant

Sworn to before me and signed in my presence,

December 30, 2008
Date

at New Orleans, Louisiana
City State

Louis Moore, Jr. — U.S. Magistrate Judge
Name of Judge — Title of Judge

Signature of Judge

AFFIDAVIT IN SUPPORT OF ARREST WARRANT

I, Matthew J. Pedersen, Special Agent with the United States Secret Service, New Orleans Field Office, being duly sworn, depose, and state as follows:

1. Your affiant has been employed as a Special Agent of the United States Secret Service (hereinafter referred to as USSS) since November 2006 and is currently assigned to the New Orleans Field Office.
2. As a Federal Agent, your affiant is authorized to investigate violations of laws of the United States and is a law enforcement officer with the authority to execute warrants issued under the authority of the United States.
3. Your affiant's present duties include the investigation of violations of bank fraud, threats against the President of the United States, wire fraud, identity theft and money laundering laws by large-scale criminal organizations within the Eastern District of Louisiana.

FACTS AND CIRCUMSTANCES

4. This affidavit is made in support of an arrest warrant for Gregory Broussard. On 12/29/08, your affiant received information that an individual had made a threat against the President of the United States at North Oaks Hospital located at 15790 Paul Vega MD Dr., Hammond, LA.

5. Your affiant then responded to North Oaks Hospital in order to interview Mindy Lee, a North Oaks Social Worker who treated Broussard. Lee advised agents that while being evaluated in the emergency room, Broussard threatened to "Blow up the White House," and "Kill President Bush." Broussard also stated that he needed a ride to the Lutcher hospital because he had weapons in his vehicle.

6. After interviewing Lee, agents located a white 2004 Toyota Camry, Louisiana license plate NTP718, registered to Gregory Broussard, parked in the parking lot in front of the emergency room.

7. Your affiant and Agent Hamel then interviewed Gregory Broussard at the St. James Behavioral Hospital located at 2471 Louisiana Ave., Lutcher, LA. During the course of the interview, your affiant asked Broussard if there were any weapons in his vehicle or his residence. Broussard answered with a series of conflicting statements. Broussard initially stated that he "knows how to make napalm" and that he is a "pyromaniac." Broussard then stated that he had weapons in his vehicle, but subsequently stated that did not. Your affiant then asked Broussard if he had ever travelled to the site of an assassination. Broussard advised that on or about 12/27/08 he travelled to Baton Rouge where he placed his hands in the bullet holes on the wall left by Huey P. Long's assassination. Broussard then stated that he conducted "Reconnaissance" of the capital building and governor's mansion. Broussard advised that during this reconnaissance he placed himself in the position of both a spotter and sniper in order to better protect

President Elect Obama when he invites him to attend the Bayou Classic. Broussard then stated that during his reconnaissance, he took photographs from various vantage points around the capital and governor's mansion. Broussard advised that he keeps all of the images on disks he stores in bags at his residence. In addition, Broussard advised that he keeps an encrypted journal of his activities. Your affiant then asked Broussard for consent to search both his residence and vehicle. Broussard then read the written consent to search form for his residence and stated "that's where I manufacture my napalm," and that he did not want agents to find something that he could be arrested for. During the course of the interview, Broussard informed your affiant that he will follow the commands of auditory hallucinations if they talk to him nicely. Broussard also informed your affiant that if the voice of god instructs him to kill the president, he would follow the instructions.

8. Your affiant then informed the Louisiana State Police of the fact that Broussard had been conducting reconnaissance in the vicinity of the state capital and governor's mansion. Based upon the information provided by your affiant, the Louisiana State Police obtained a search warrant for Broussard's 2004 Toyota Camry, Louisiana license plate NTP 718, and his residence located at 44234 Nicholas Circle, Hammond, LA.

9. During the course of executing the search warrant on Broussards vehicle, a digital

camera containing recent photographs of the U.S. Naval Academy, a lease for an apartment in Annapolis, MD, a private investigation report listing the address of Halle Barre's mother, and numerous travel pamphlets were discovered.

10. During the course of searching Broussards residence located at 44234 Nicholas Circle, Hammond, LA, the following items were discovered.

    a. The DVD "Shooter," a movie about a sniper, playing in the DVD player.

    b. The novel "Shooter," President Elect Obama's book "Audacity of Hope," the book "Aikido and the Dynamic Sphere," and "SWAT Magazine" were located on the office desk.

    c. The books "Legacy of Ashes," the "History of the CIA" and "Reading the Enemy's Mind."

    d. A backpack containing the books, "Inside the CIA," "The Finishing School," "The Warrior Elite," "Sniper Training, Techniques, and Weapons," and "Ultimate Special Forces." The book "Ultimate Special Forces" contained a piece of paper marking a pair of pages. These pages illustrated a technique to conduct and react to ambushes.

    e. One "Cheaper Than Dirt" ammunition and weapon accessory catalogue.

    f. The book "U.S. Special Forces."

    g. Magazines titled "Black Guns," "Combat Rifles," "Combat Arms," and "Handguns."

h. A SD Card containing images of the Louisiana state capital, and the governor's mansion.

i. Winchester .22 caliber rifle.

11. Your affiant then interviewed Sgt. Alex Richardson of the Tangipahoa Parish Sheriff's Office. Richardson advised your affiant that while working an off duty detail at the North Oaks Hospital on 12/29/08, he heard Broussard scream across the emergency room that he was going to kill President Bush.

12. Based on the information in this affidavit, your affiant respectfully requests an arrest warrant for Gregory Broussard for violating Title 18 USC 871 Threats Against President and Successors to the Presidency.

Matthew J. Pedersen

MATTHEW J. PEDERSEN, SPECIAL AGENT

UNITED STATES SECRET SERVICE

Sworn to and subscribed before me

This 30th day of December, 2008

Louis Moore

Honorable Louis Moore, Jr.

United States Magistrate Judge