

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. Mary L. Cooper  
 :  
 v. : Crim. No. 14- (MLC)  
 :  
 JORDAN S. GONZALEZ : 18 U.S.C. § 175(a)  
 : 21 U.S.C. § 843(a)(6)

I N F O R M A T I O N

The defendant having waived in open court prosecution by indictment, the United States Attorney for the District of New Jersey charges:

COUNT 1  
18 U.S.C. § 175(a)  
(Attempted Possession of  
Toxins For Use as a Weapon)

Background

1. At all times relevant to Count 1 of this Information:
  - a. Defendant JORDAN S. GONZALEZ was a licensed pharmacist who resided in Jersey City, New Jersey, and, later, in New York, New York.
  - b. Ricin was a highly toxic protein that naturally occurred in the seeds of the *ricinus communis* plant. A lethal dose of ricin could be extracted from these seeds.
  - c. Abrin was a highly toxic protein that naturally occurred in the seeds of the *abrus precatorius* plant. A lethal dose of abrin could be extracted from these seeds.

d. RDX (which stands for “Research Department Explosive”) was the explosive component of powerful explosives used in military and commercial demolition applications.

e. Sodium azide was a toxic, gas-forming compound that could explode at high temperatures and was lethal if ingested or absorbed through the skin.

f. A company (hereinafter “Company One”) was headquartered in California and operated an on-line marketplace through which third-party vendors in the United States and abroad sold products to members of the public.

#### The Defendant’s On-Line Purchases

2. On or about March 22, 2009, defendant GONZALEZ established an account with Company One allowing him to purchase items from third-party vendors in the United States and abroad. Thereafter, defendant GONZALEZ purchased through Company One and caused to be delivered to his apartment in Jersey City, New Jersey, a variety of items in his attempt to develop, produce, and possess ricin and abrin for use as a weapon, including, among other things, large quantities of *abrus precatorius* and *ricinus communis* seeds, equipment, manuals, and materials related to the extraction and dispersal of said toxins, a 1-gallon liquid sprayer, and a crossbow and arrows, as more fully set forth in Paragraphs 3 through 5 of Count 1 of this Information.

3. On or about the dates listed in the table below, and using his Company One account, defendant GONZALEZ purchased *ricinus communis* and *abrus precatorius* seeds in the approximate quantities listed in the table below, which items were delivered to defendant GONZALEZ'S apartment in Jersey City, New Jersey:

| <b>Date</b>    | <b>Item</b>                    | <b>Quantity</b> |
|----------------|--------------------------------|-----------------|
| Sept. 18, 2011 | <i>Ricinus communis</i> seeds  | 25              |
| Feb. 18, 2012  | <i>Ricinus communis</i> seeds  | 100             |
| Feb. 21, 2012  | <i>Ricinus communis</i> seeds  | 100             |
| Mar. 11, 2012  | <i>Abrus precatorius</i> seeds | 400             |
| Mar. 24, 2012  | <i>Abrus precatorius</i> seeds | 1000            |
| Apr. 1, 2012   | <i>Abrus precatorius</i> seeds | 1000            |
| Aug. 25, 2012  | <i>Abrus precatorius</i> seeds | 3000            |
| Aug. 26, 2012  | <i>Ricinus communis</i> seeds  | 1000            |
| Aug. 28, 2012  | <i>Ricinus communis</i> seeds  | 1000            |
| Oct. 31, 2012  | <i>Abrus precatorius</i> seeds | 5000            |
| Jan. 29, 2013  | <i>Ricinus communis</i> seeds  | 100             |
| Jan. 29, 2013  | <i>Ricinus communis</i> seeds  | 1000            |
| Mar. 3, 2013   | <i>Ricinus communis</i> seeds  | 100             |
| Mar. 3, 2013   | <i>Ricinus communis</i> seeds  | 2000            |
| Mar. 19, 2013  | <i>Ricinus communis</i> seeds  | 2000            |

4. On or about the dates listed in the table below, and using his Company One account, defendant GONZALEZ purchased the following items associated with the extraction and deployment of toxins, which items were delivered to defendant GONZALEZ'S apartment in Jersey City, New Jersey:

| <b>Date</b>    | <b>Item</b>   | <b>Quantity</b> |
|----------------|---|-----------------|
| Aug. 24, 2011  | Digital pH meter  | 1               |
| Oct. 13, 2011  | Sulfuric acid   | 1 gallon        |
| Feb. 28, 2012  | Sodium hydroxide (lye)                                  | 16 pounds       |
| Mar. 6, 2012   | Laboratory distillation kit                             | 1               |
| Mar. 16, 2012  | Acetone   | 32 ounces       |
| Mar. 16, 2012  | Crossbow pistol   | 1               |
| Mar. 24, 2012  | Dimethyl sulfoxide ("DMSO")                             | 1 gallon        |
| Mar. 26, 2012  | Laboratory filtering flask, funnel, pump, paper filters | Various         |
| Apr. 4, 2012   | Glass vials (8 ml)                                      | 144             |
| Apr. 12, 2012  | Crossbow tips   | 6               |
| May 23, 2012   | Acetone   | 2 gallons       |
| July 31, 2012  | Polypropylene filter bag                                | 1               |
| Sept. 11, 2012 | Manual steel grinder                                    | 1               |
| Sept. 17, 2012 | Crossbow pistol with arrows                             | 1               |
| Nov. 25, 2012  | Particulate respirator masks                            | 50              |
| Jan. 24, 2013  | Sodium sulfate  | 1 pound         |
| Jan. 24, 2013  | Carbon tetrachloride                                    | 500 milliliters |
| Feb. 1, 2013   | Laboratory glassware kit                                | Various         |
| Feb. 2, 2013   | 2000ml laboratory flask                                 | 1               |
| Apr. 9, 2013   | Carbine spear gun                                       | 1               |
| May 31, 2013   | DMSO  | 12 ounces       |
| June 1, 2013   | 1-gallon capacity spraying device                       | 1               |

5. On or about the dates listed in the table below, and using his Company One account, defendant GONZALEZ purchased the following items associated with synthesizing RDX, which items were delivered to defendant GONZALEZ'S apartment in Jersey City, New Jersey:

| Date          | Item                  | Quantity  |
|---------------|-----------------------|-----------|
| Feb. 13, 2012 | Sodium nitrate        | 5 pounds  |
| Feb. 17, 2012 | Hexamine fuel tablets | 240       |
| Feb. 17, 2012 | Nitric acid           | 48 ounces |
| Mar. 9, 2013  | Hexamine powder       | 10 pounds |
| Mar. 23, 2013 | Acetic anhydride      | 1 liter   |
| May 12, 2013  | Acetic anhydride      | 4 liters  |

6. On November 8, 2013, and using his Company One account, defendant GONZALEZ purchased 1 kilogram of sodium azide, which item was destined for delivery to defendant GONZALEZ'S apartment in New York, New York, before being intercepted by law enforcement officers as part of this investigation.

The Searches of Defendant Gonzalez's Premises

7. On or about November 14, 2013, law enforcement officers executed search warrants at premises occupied and/or controlled by defendant GONZALEZ, including an apartment and storage unit in Jersey City, New Jersey, and an apartment in New York, New York (collectively, the "Searches"). During the execution of the Searches, law enforcement officers recovered the following items, among other things:

- a. approximately 941 *ricinus communis* seeds;
- b. approximately 11,013 *abrus precatorious* seeds;
- c. acetone, laboratory equipment, particulate respirators, a pH meter, DMSO, crossbow pistols and arrows, and a 1-gallon capacity spraying device;

- d. explosives precursor materials and manuals and guides for synthesizing explosives and making destructive devices, but no completed explosive mixtures or destructive devices were detected;
- e. a manual that provided information related to extracting ricin from *ricinus communis* seeds using acetone, filtering equipment, particulate respirators, pH meters, lye, sodium sulfate, and carbon tetrachloride. This manual also contained instructions for delivering toxins to other persons through, among other things, DMSO, projectile weapons, and spraying devices.
- f. another manual containing instructions for synthesizing RDX using hexamine, nitric acid, and sodium nitrate, that, among other things, stated: "R.D.X. can be made by the surprisingly simple method outlined hereafter. It is much easier to make in the home than all other high explosives. . . ."
- g. approximately 1,000 rounds of ammunition, handguns, components for assault rifles and submachine guns, high-capacity magazines, and a bulletproof vest.
- h. numerous books and documents related to the collapse of social order and techniques for surviving in a lawless environment.

The Charge

8. Beginning in or about August 2011, through on or about November 14, 2013, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

JORDAN S. GONZALEZ,

did knowingly attempt to develop, produce, and possess toxins, as defined by Title 18, United States Code, Section 178(2), including ricin and abrin, for use as a weapon.

In violation of Title 18, United States Code, Section 175(a).

COUNT 2  
21 U.S.C. § 843(a)(6)  
(Possessing a Prohibited Flask Intended  
for Manufacture of a Controlled Substance)

1. The allegation set forth in Paragraph 1a of Count 1 of this Information is hereby realleged as if fully set forth herein.
2. On or about November 14, 2013, in Hudson County, in the District of New Jersey and elsewhere, the defendant,

JORDAN S. GONZALEZ,

did knowingly and intentionally possess a three-neck round-bottom flask intending that it would be used to manufacture a controlled substance, contrary to Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 843(a)(6).



PAUL J. FISHMAN  
United States Attorney

CASE NUMBER: 2014R00023

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**INFORMATION FOR**

18 U.S.C. 175(a)  
21 U.S.C. § 843(a)(6)

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