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7 UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

9 UNITED STATES OF AMERICA,
10 Plaintiff,
11 v.
12 CHARLES ALAN WILSON,
13 Defendant.

CASE NO. **MT 10-155**
FELONY COMPLAINT

14
15 BEFORE, James P. Donohue, United States Magistrate Judge, Seattle, Washington.

16 The undersigned complainant, being duly sworn, alleges:

17 **COUNT 1**

18 **(Threatening a Federal Official)**

19 Beginning on or about March 22, 2010, and continuing until on or about
20 April 4, 2010, within the Western District of Washington and elsewhere, the defendant,
21 CHARLES ALAN WILSON, threatened to assault and murder a United States official,
22 namely, United States Senator Patricia L. Murray, with the intent to impede, intimidate,
23 and interfere with such official while engaged in the performance of official duties, and
24 with the intent to retaliate against such official on account of the performance of official
25 duties.

26 All in violation of Title 18, United States Code, Sections 115(a)(1)(B) and (b)(4).

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1 **AFFIANT'S TRAINING AND EXPERIENCE**

2 I, Carolyn W. Woodbury, am a Special Agent with the Federal Bureau of
3 Investigation, and have been so employed since September 1997. I am currently assigned
4 to the violent crime/organized crime squad in the Seattle, Washington office. As an FBI
5 Special Agent, I have investigated a variety of violent crimes, including cases involving
6 threats of violence, and I have investigated criminal organizations involved in, among
7 other things, illegal gambling, loansharking, and narcotics trafficking. Prior to my
8 employment with the FBI, I was employed as a Probation Officer in the Los Angeles
9 County Probation Department for approximately eight years. I have earned a Bachelor of
10 Arts degree from The Masters College and a Masters Degree in Criminal Justice from
11 California State Long Beach University.

12 The facts in this Complaint consist of information I gathered and observed first-
13 hand through the course of this investigation, as well as information related to me orally
14 by other law enforcement personnel and through interviews of witnesses, and finally
15 information obtained from reviewing reports written by other investigators working with
16 me on this case. The information set forth in this affidavit is not intended to detail each
17 and every fact and circumstance of the investigation or all information known to me or
18 the investigative participants. Rather, this affidavit serves to establish that probable cause
19 exists to believe that CHARLES ALAN WILSON committed the crime of Threatening a
20 Federal Official, as alleged above.

21 **PROBABLE CAUSE EVIDENCE OF THE CRIMINAL OFFENSE**

22 **A. Introduction.**

23 On March 24, 2010, the Seattle Division of the FBI was contacted by M.G., a staff
24 member for United State Senator Patty Murray. M.G. reported that over the past several
25 months, an unknown male has been calling Senator Murray's office¹ on numerous
26 occasions, often leaving voicemail messages directed at Senator Murray. According to
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¹ Senator Murray's office is located in the Jackson Federal Building at 915 2nd Avenue, Seattle, Washington.

1 M.G., the caller has been blocking his telephone number every time he calls, and he often
2 calls after work hours, early in the morning, or on weekends. M.G. reported that until
3 recently, the voicemail messages were merely harassing in nature. The caller often used
4 vulgar and offensive language, but he did not make overt threats against Senator Murray.
5 However, beginning on or about March 22, 2010, the caller began to make overt threats to
6 kill and/or injure Senator Murray, as well as to have her killed and/or injured. As
7 described below, through subsequent investigation the caller has been positively
8 identified as the defendant, CHARLES ALAN WILSON.

9 The timing of the threats coincided with the recent passage of the health-care
10 reform legislation. Specifically, it is a matter of public record that on March 21, 2010, the
11 health-care reform bill was approved by the United States Congress. The President of the
12 United States signed the bill into law on March 23, 2010. As detailed below, WILSON
13 began leaving threatening voicemail messages for Senator Murray on March 22, 2010.
14 During many of the voicemails, WILSON expressed his strong disapproval for the health-
15 care reform legislation, and the fact that Senator Murray voted in support of the bill.

16 **B. The Recorded Voicemail Messages Left by WILSON.**

17 Beginning on March 22, 2010, M.G. began to record and save WILSON's
18 voicemail messages. During the morning of March 22, 2010, WILSON made the
19 following statements over a series of voicemail messages left at Senator Murray's office:

20 I hope you realize, there's a target on your back now. There are many
21 people out there that want you dead. Just remember that as you are
22 politicking for your reelection. It only takes one piece of lead. . . . Kill the
23 fucking senator! Kill the fucking senator! I'll donate the lead. . . . Now
24 that you've passed your health-care bill, let the violence begin. Let the
25 violence begin. There's people gonna get hurt over this son of a bitch. We,
26 the people, will not subside, succumb to socialism. Let the violence begin.
27 You will find out and you will actually really pay. You have awakened a
28 sleeping giant. The American people will not put up with it. We are not a
country of cowards, as one of the high ranking people of this administration
says. You'll find out how fucking cowardly we really are, my dear. Better
get under your desk, get on your (unintelligible).

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1 On March 23, 2010, at 10:19 a.m., WILSON left the following voicemail message
2 for Senator Murray:

3 With the passing of your health-care bill, it is living proof now that . . .
4 This great country that believes in God and guns. Since you've done this,
5 there's going to be some bigger targets on your fucking back. . . . I hope
6 somebody kills you, and I hope somebody kills [the President]. Yes, die,
7 dead. You're signing my death warrant, so I want to sign yours, fucking
8 bitch.

9 On March 23, 2010, at 10:23 a.m., WILSON left the following voicemail message
10 for Senator Murray:

11 As you grow older, you are going to have a target on your back forever, for
12 voting in socialism into this country with your health-care bill and your cap
13 'n tax. Your gonna have a target on your back for the rest of your life.
14 How long do you think you can hide? Yes, for the rest of your life. And
15 there is going to be – it could be a senior citizen, could be an veteran, could
16 be a mad momma, an upset momma. By your attempts to overtake this
17 country with socialism, somebody's gonna get to you one way or another
18 and blow your fucking brains out, and I hope it does happen. If I have the
19 chance, I would do it. You have created a hatred in this country against
20 socialism, and you low-life backstabbing, lying, cheating, politicians are
21 going to be held accountable. And hopefully it is with your life. I hope it's
22 with your life. I hope somebody takes your fucking fat ass fucking out, I
23 really do. And it's just my belief. I'm not a tea party bagger. I'm an
24 independent U.S. voter. I'm neither Republican nor Democrat. I hope you
25 fucking die. I want to fucking kill you. I hope somebody fucking hangs
26 you, blows your fucking brains out. We will not be socialized, you fucking
27 cunt. Get it through your fucking head. You have – You are a marked
28 person for the rest of your fucking life, you fucking slut.

1 On March 23, 2010, at 10:28 a.m., WILSON left the following voicemail message
2 for Senator Murray:

3 Kill the fucking Senator! Hang the fucking Senator! I hope somebody puts
4 a fucking bullet between your fucking eyes. Far left liberal socialist
5 democratic bitch. You mother-fucker. You sold the fucking people of the
6 country out for socialism. I hope somebody fucking erases your fucking
7 life. Yes, I hope somebody assassinates you, you fucking bitch.

8 Also on March 23, 2010, WILSON made the following statements over the course
9 of several additional voicemail messages left at Senator Murray's office:

10 In watching how this government works, this is not a striking and what
11 you're doing to this country, I surely hope somebody puts a fucking bullet
12 through your fucking brain. I hope they blow your fucking brain all over
13 the fucking wall. Yes, I hope somebody assassinates you. I wish somebody
14 would kill you. . . . I wish somebody would blow your ass off the face of
15 the fucking earth. Yes, assassinate you. I wish somebody would blow your
16 fucking brains out. . . . Not only do I say, "Kill the bill!" I say: Kill the

1 fucking Senator! Hang the fucking bitch! Hang that mother-fucking bitch
2 from a fucking gallows! Kill the bill, kill the Senator too.

3 * * * * *

4 I do believe that every one of you mother-fucking socialist democratic
5 progressive mother-fuckers need to be taken out. Put in front of a fucking
6 firing squad and shot between the fucking eyes. Assassinated, you fucking
7 low-life. There is a growing hatred, my dear, for you progressive socialist
8 democrats. Socialism will not work. There is a growing hatred. And guess
9 who caused it? You, you! My hatred is coming from you, you fucking slut.
10 Since you are going to put my life at risk, and some bureaucrat is going to
11 determine my health-care, your life is at risk, dear. Yes, your life is at risk.
12 There are a lot more of us. There are a lot of crazy people out there, and
13 your security may stay with you for a long time, but somebody will get
14 through. You never know. Your life is in danger, since you're putting my
15 life in danger. Turn about's fair play.

16 On March 23, 2010, at 5:07 p.m., WILSON left the following voicemail message
17 for Senator Murray:

18 Fuck you socialists up the ass. You're dead fucking meat, Murray! You're
19 dead fucking meat! Baby killer, Murray. I hope somebody gets through
20 your security and blows your fucking brains out, you fucking baby killing
21 fucking bitch. Yeah, you fucking spineless, fucking whore. You Pike
22 Street fucking whore. I hope somebody gets through your security and
23 blows your fucking brains out, you fucking baby killer. Blows your fucking
24 brains out. We will not be socialized, you fucking cunt. Get it through your
25 fucking head. You have - You are a marked person for the rest of your
26 fucking life, you fucking slut.

27 On March 24, 2010, at 8:09 a.m., WILSON left the following voicemail message
28 for Senator Murray:

29 Senator, you just got done fucking the people of this State, the senior
30 citizens of this country and most everybody else, to satisfy your ideological
31 ideas. We are going to fuck you up. We are going to fuck you up as bad as
32 we can. Yes, the independents. The real people of this country, not you
33 spineless fucking socialists. You better watch your fucking back, baby,
34 because there's people gonna come after you with fucking both fucking
35 barrels, bitch. You fucking Pike Street whore.

36 On March 24, 2010, 8:11 a.m., WILSON left the following voicemail message for
37 Senator Murray:

38 Somebody is eventually gonna get through your security and put a fucking
gun to your head, and hopefully I will be able to watch somebody blow your
fucking brains out. You're so fucking ignorant. I would actually pay to
help that person, you fucking sleeze-ball fucking cunt. You are ruining this
country. You have awakened a sleeping giant and we are coming after you.
Yes, we the people. As you trash our Constitution, you tried to lead us into
a socialistic nation, we're gonna fuck you up. We're gonna fuck you up so

1 fucking bad, you're gonna be fucking. . . . I hope somebody gets through
2 your security and blows your fucking brains out. Yes, I truly, really, with
all my heart, hopefully somebody does that.

3 On March 24, 2010, at 10:24 a.m., WILSON left the following voicemail message
4 for Senator Murray:

5 The old saying goes, my dear, all's fair in love and war. This is war, so
6 everything is fair. Cover your back. You better have eyes in the back of
7 your head. Cover your back, all's fair in love and war. Nobody comes out
8 a winner. You may think you're a winner now. You're gonna be the
biggest fucking loser. You have a horrendous amount of people that dislike
you and your policies, and since we are, you have declared war on the
American citizens, and we are declaring war upon you. Watch your back.

9 On March 26, 2010, at 4:34 a.m., WILSON left the following voicemail message
10 for Senator Murray:

11 Now that you have finally screwed the people of this State and helped screw
12 the people of this country, I hope that you are very, very proud of yourself.
13 You'll go down in the annals of time as one of the most fantastic Pike Street
14 whores that Washington has ever had. I want to thank you so much for
15 ruining my life and yes, for killing babies. Voting on a bill that kills babies,
16 you ought to be very, very proud of yourself. That's what you should run
17 on from this Fall as you run around town in your sneaker shoes. Yes, uh,
18 it's not that I hate you. I've never met you. But your policies and your
19 ideals suck. Yes. In your dying days, I hope it turns around and bites you
20 in the fucking ass so fucking hard, you fucking cunt.

21 On March 27, 2010, at 9:27 a.m., WILSON left the following voicemail message
22 for Senator Murray:

23 . . . I hope we shove this health-care bill so far down your throat. You
24 shoved it down our throat, we're gonna shove it up your ass. Yes, we're
25 gonna shove it right up your ass. We're gonna take your ass out of office.
26 That way, you cannot harm us any more. Maybe I will not have to go to the
27 end-of-life classes that you have planned for me. Maybe you should go to
28 the end-of-life classes that you have planned for us. Because you're gonna
be there some day, too, yourself. So you better study up, my dear.

On March 27, 2010, at 6:10 p.m., WILSON left the following voicemail message
for Senator Murray:

Yes, Patty, I hope you choke on your health-care bill. We're choking on it.
Yes, me are a senior citizen on social security and medicare. I want to
thank you so much, very very much, for signing my death warrant. You,
you have given me so much in your career, I don't know how to thank you.
Oh, gee, thank you so much. I, I just love this new health-care bill. I'm
glad I finally got to state that I need to go pass away when I have out-lived
my usefulness to you. Yes, that makes me so glad. At least I know that I
will be taken care of, you know, in the after-life. . . . It's sad to say, but uh,

1 we won't go down without a fight. A big fight, and it can hurt people.
2 You're already hurting me, so when I'm hurt, I want to hurt back. And I
3 think that turn-about's fair play. . . . Thank you so much for signing my
4 death warrant. Too bad it's not yours.

5 On March 29, 2010, at 5:04 a.m., WILSON left the following voicemail message
6 for Senator Murray:

7 Senator . . . Fuck you. You are fired. You are 86'ed. Fuck you, you Pike
8 Street fucking whore. You fucking slut. Come over to Yakima and list-
9 Come on down to Grandview and get some more spit dick there, you old
10 fucking cunt.

11 On March 30, 2010, at 5:25 p.m., WILSON left the following voicemail message
12 for Senator Murray: "Fuck you liberals. We're gonna take you out, Murray. We're gonna
13 take you out. Fuck you, God damn liberals."

14 On April 4, 2010, at 8:00 p.m., WILSON left the following voicemail message for
15 Senator Murray:

16 Oh, you were in Yakima last week.² How come you didn't give a big
17 speech to the people outside waiting to see you? Yeah, we were outside
18 waiting for you, hopefully you would come out and explain to us how come
19 this health-care bill that you railed on so highly is going to create the
20 biggest drain in American history. It's going to cause so much pain and
21 suffering. I would like to thank you so much, for robbing from me and
22 putting on my children's plate the most ridiculous, underhanded, back-door
23 lying, cheating, unconstitutional. You are fantastic. I want to thank you for
24 the pain and suffering I am having. Fuck you, you fucking slut, you fucking
25 cunt. I wish you the fucking pain I am going through. I wish it upon you. I
26 hope you had the worst fucking Easter of you entire fucking life. We are
27 coming after you, bitch, taking you out of fucking office. We are going to
28 remove you from doing any more damage to the people that you are
supposed to represent, not rule. Fuck you cunt, you fucking Pike Street
fucking slut.

29 **C. The Identification of WILSON as the Caller.**

30 I have listened to the above referenced voicemail recordings. The caller on each of
31 the voicemail messages has a distinctive voice, and it is clear that the same caller left each
32 of the messages. In an effort to identify the caller, I obtained and reviewed telephone
33 records for Senator Murray's office. The office is assigned the toll-free telephone
34 number (866) 481-9186. This line is operated by Verizon Business. I requested and
35

36 _____
37 ² I was informed by Senator Murray's staff that on April 1, 2010, Senator Murray was in
38 Yakima speaking at an event at the Yakima Chamber of Commerce.

1 received Verizon Business records pertaining to all incoming calls to Senator Murray's
2 office number for a three day period, from March 25-27, 2010.³ During this period, the
3 subject of the investigation called Senator Murray's office and left voicemail messages on
4 seven occasions: on March 25, 2010, at 3:04 p.m, 6:44 p.m., and 10:45 p.m.; on March
5 26, 2010, at 4:34 a.m. and 5:55 p.m.; and on March 27, 2010, at 9:27 a.m. and 6:10 p.m.
6 The Verizon Business records indicate that phone number (509) 697-6970 placed each of
7 the calls to Senator Murray's office, with the exception of the call on March 25, 2010, at
8 10:45 p.m., which did not appear in the records.

9 Telephone number (509) 697-6970 is a publically listed hard line telephone
10 number, subscribed to by the defendant, CHARLES ALAN WILSON, at 804 W. Barlett
11 Avenue, Selah, Washington. According to the records of the Washington State
12 Department of Licensing, WILSON has a Washington State driver's license registered to
13 him at the above address.

14 On April 1, 2010, for the purpose of further confirming that the caller on the
15 voicemails was, in fact, WILSON, FBI Special Agent Cory Cote ("S/A Cote") placed an
16 undercover phone call to (509) 697-6970. During the call, S/A Cote disguised himself as
17 a representative of "Patients United Now," a group that was ostensibly attempting to have
18 the federal health-care reform legislation repealed. The call lasted approximately
19 fourteen minutes, and it was consensually recorded by S/A Cote.

20 When S/A Cote dialed (509) 697-6970, a male answered the phone. S/A Cote
21 stated that he represented Patients United Now, and asked for "Mr. Wilson." The male
22 confirmed that he was WILSON. Both S/A Cote and myself have reviewed the recording
23 of this conversation, and both of us have concluded that WILSON's voice, as heard
24 during the call with S/A Cote, is the same voice heard on each of the above referenced
25 voicemails left at Senator Murray's office. Based on this voice identification, I believe
26 that WILSON is the person who left the voicemail messages at Senator Murray's office.

27
28 ³ I also have requested, and am still waiting to obtain, records relating to all of WILSON's
outgoing phone calls since January 1, 2010.

1 Moreover, during the conversation with S/A Cote, WILSON made several
2 statements that further confirm he was the caller on the voicemail messages, including:
3 (a) WILSON repeatedly expressed his strong dislike for the recent health-care reform
4 legislation (*i.e.*, “I hate it. I hate it!”); (b) WILSON confirmed that he regularly placed
5 calls to Senator Murray’s and Senator Maria Cantwell’s offices (*i.e.*, “I call Murray every
6 day. I call Cantwell. They don’t like hearing from me. . . . I call them everyday.”);
7 (c) WILSON referred to Senators Murray and Cantwell as the “Pike Street whores,” as
8 does the caller in the voicemail messages; (d) WILSON also referred to Senator Murray
9 as “sneaker shoes Murray,” a phrase that also was stated on some of the voicemail
10 messages; and (e) WILSON made the following remarks, which are similar to the rhetoric
11 in many of the voicemail messages: “They need to be strung up, and I mean put [in] the
12 gallows. I will take no prisoners. . . . And I don’t care what they think. They want to
13 come throw me in jail, they can go ahead and do that. That’s fine.”

14 During the conversation with S/A Cote, WILSON also discussed the fact that he
15 possessed, and regularly carried, a firearm. Specifically, WILSON stated:

16 I do pack, and I will not blink [] when I’m confronted, and that is a
17 guarantee. It’s not a threat, it’s a guarantee. . . . And I work in a
18 neighborhood where I have to pack. . . . But I pack a .38 and I – If
 somebody says, I will not blink. . . . Cops only minutes away, but then
 seconds count. . . . That’s how come I pack a firearm.

19 My investigation has confirmed that WILSON has been issued a valid concealed weapons
20 permit, and that he has a .38 caliber Smith & Wesson revolver registered to him.

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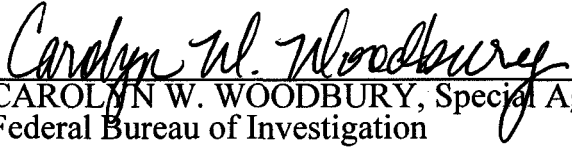
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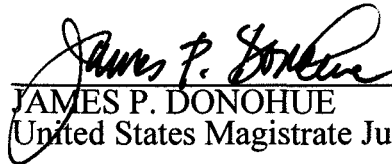
1 CONCLUSION

2 Based on the foregoing, there exists probable cause to believe that CHARLES
3 ALAN WILSON committed the offense of Threatening a Federal Official, in violation of
4 Title 18, United States Code, Sections 115(a)(1)(B) and (b)(4).

5
6 
7 CAROLYN W. WOODBURY, Special Agent
8 Federal Bureau of Investigation

9 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
10 presence, the Court hereby finds that there is probable cause to believe that the defendant
11 committed the offense set forth in the Complaint.

12 Dated this 5th day of April, 2010.

13 
14 JAMES P. DONOHUE
15 United States Magistrate Judge