

United States District Court
For The District of Columbia

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

V.

JAMES WENNEKER VON BRUNN
DOB: 07/11/1920

FILED

JUN 11 2009

CASE NUMBER:

09-339-M-09

Clerk, U.S. District and
Bankruptcy Courts

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

See Attachment A.

in violation of Title 18 United States Code, Section(s) 1111 and 930(b) & (c).

I further state that I am Ronald Farnsworth, Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

See Attached Affidavit

Continued on the attached sheet and made a part hereof:

☒ Yes

☐ No

Nicole H. Waide (by SM)

AUSA, NICOLE H. WAID [REDACTED]
Sworn to before me and subscribed in my presence,

JUN 11 2009

Date

JOHN M. FACCIOLA
U.S. MAGISTRATE JUDGE

Name & Title of Judicial Officer

ALAN KAY
U.S. MAGISTRATE JUDGE

at

Washington, D.C.
City and State

Signature of Complainant

RONALD FARNSWORTH, Special Agent
Federal Bureau of Investigation

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Ronald Farnsworth, being duly sworn, hereby depose and state as follows:

1. This affidavit is submitted in support of an application for a criminal complaint against **James Wenneker Von Brunn** for violations of 18 U.S.C. § 1111 (Murder) and 18 U.S.C. § 930(b) & (c) (Killing in the Course of Possession of a Firearm in a Federal Facility).

Affiant's Experience

2. Affiant is a Special Agent with the Federal Bureau of Investigation, and has been employed in that capacity since 2003. During this time, affiant has been involved in the investigation of violations of federal statutes pertaining to domestic terrorism, international terrorism, and violent crime.

3. Affiant has personally participated in this investigation and has witnessed many of the facts and circumstances. In addition, affiant has received information from other federal law enforcement officials. Affiant has also reviewed documents obtained from other federal agencies and local law enforcement agencies, as well as documents obtained via search warrant of the residence and vehicle. The statements contained in this affidavit are based on affiant's own observations and review of documents, or reliable information provided to affiant by other law enforcement personnel. This affidavit is being submitted for the limited purpose of securing a criminal complaint. Affiant is setting forth only those facts and circumstances which he believes are necessary to establish probable cause for the issuance of the requested criminal complaint.

Factual Basis for Probable Cause

4. Based on Affiant's investigation, the following facts, among others not included for the purpose of this affidavit, are known:

- a. On or about June 10, 2009, at approximately 12:44 p.m., a white male, later identified to be James Wenneker Von Brunn, 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 U.S. Holocaust Memorial 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).
- b. The defendant was driving a 2002 red Hyundai bearing Maryland license plate number 6BVR16. The defendant 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 defendant was carrying a rifle at his side as he approached the building.

- c. As the defendant approached the entrance to the museum, Special Police Officer ("SPO") Steven Tyrone Johns, who was employed as a security guard for the museum, opened the door for the defendant. The defendant raised his rifle, aimed it at SPO Johns and fired one time, striking SPO Johns in the left, upper chest area.
- d. The defendant continued through the door and raised his firearm as if to fire again, at which time two other Special Police Officers on duty immediately returned fire at the defendant. The defendant was shot in the face and fell backwards outside the door.
- e. 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.
- f. When officers responded to the scene, they found the defendant suffering from a gunshot wound to the face. A .22 caliber rifle was recovered next to the defendant. U.S. Park Police officers also retrieved a wallet from the defendant's pants pocket. The wallet contained a license bearing the name James Wencker Von Brunn with a date of birth of July 11, 1920. The wallet also contained multiple other items (insurance cards, bank card, social security card, other identification cards) in the name of James Von Brunn.
- g. Stephen Tyrone Johns was transported by DC EMS 4 to George Washington Hospital, suffering from a gunshot wound to the upper chest. All life-saving efforts failed and Steven Tyrone Johns was pronounced dead by Dr. Najan at approximately 3:08 pm on June 10, 2009.
- h. A SPO, hereinafter identified as W-1, was interviewed and indicated the following: W-1 was working as an armed SPO at the Holocaust Museum on June 10, 2009. As W-1 was working at the 14th Street entrance to the Museum he heard two to three shots fired. He looked to his right and saw the barrel of a rifle pointing into the entrance door. W-1 returned fire as did a second SPO. The gunman then fell to the ground just outside the door. W-1 secured the gunman's rifle and awaited the arrival of the police and emergency medical personnel. W-1 indicated that the gunman's firearm appeared to be a .22 caliber rifle.
- i. MPD evidence technicians recovered several items of evidence from the scene, including eight .38 caliber cartridge casings, three .22 caliber cartridge casings, and a .22 caliber rifle loaded with ten live rounds of ammunition.

- j. Officers responding to the scene secured the 2002 Red Hyundai. Further investigation revealed that the vehicle, a 2002 red Hyundai bearing Maryland license plate number 6BVR16 and vehicle identification number KMHCG45C82U285105, is registered to James Wenneker Von Brunn, date of birth of July 11, 1920.
- k. 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. Officers did, however, recover a notebook that had handwritten notations stating the following: "You want my weapons – this is how you'll get them. The Holocaust is a lie. Obama was created by Jews. Obama does what his Jew owners tell him to do. Jews captured America's money. Jews control the mass media. The 1st Amendment is abrogated – henceforth. See: holywesternempire.org. JVB swore (LT USNR) to defend the Constitution against all enemies, foreign and domestic. Jews – Bolsheviks – Zionist are America's enemies. See: Talmud – Sanhedrin "Kill the Best Gentiles!" At the end of the above writings appears the signature: "James W. Von Brunn."
- l. On June 11, 2009, a search warrant was executed on the vehicle. Evidence technicians recovered .22 caliber ammunition.
- m. Further investigation revealed that James Wenneker Von Brunn used the address [REDACTED] FBI agents responded to that address.
- n. [REDACTED] was located in the apartment. [REDACTED] consented to an interview with FBI agents. Ms. Teel stated that James Wenneker Von Brunn moved to the apartment approximately two years ago and it is his only known address. The apartment is leased to [REDACTED] and her fiancée Erik Von Brunn, the suspect's son. James Wenneker Von Brunn has his own room and pays rent in the amount of \$400.00 per month. [REDACTED] also stated that when James moved to the apartment approximately two years ago he came with two weapons, a 30/30 rifle and a .22 caliber rifle.
- o. On June 11, 2009, a search warrant was executed at [REDACTED] Recovered from the defendant's bedroom was .22 caliber ammunition and a 30/30 rifle. Ledgers, journals, and manuscripts were also recovered.
- p. Further investigation of James Wenneker Von Brunn, date of birth of July 11, 1920, 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. The novel detailed how Von Brunn believed the government was being run by Jews and the Jews were looking to extinguish the white race.

- q. Members of the Metropolitan Police Department ("MPD") traveled to George Washington University Hospital and obtained the defendant's fingerprints. MPD fingerprint examiners compared these fingerprints to the known prints of James Wenneker Von Buren. The prints were a match, thus confirming the identification of the defendant. Additionally, officers visually confirmed that the individual being treated at the hospital for a gunshot wound to the face is the same individual whose photograph appears on the above-described Maryland driver's license carrying the name James Wenneker Von Brunn.

Conclusion

5. Based on the information set forth above it is respectfully submitted that there is probable cause to believe that **James Wenneker Von Brunn** has committed murder, in violation of 18 U.S.C. § 1111 and killing in the course of possession of a firearm in a federal facility, in violation of Title 18, United States Code, Section 930(b) & (c)).

I declare under the penalty of perjury that the information provided above is true and correct.

Dated June ____, 2009.

Ronald Farnsworth
Special Agent
Federal Bureau of Investigation

JUN 11 2009

SUBSCRIBED AND SWORN TO before me this ____ day of June, 2009

United States Magistrate Judge

~~JOHN M. FACCIOLA
U.S. MAGISTRATE JUDGE~~

~~ALAN KAY
U.S. MAGISTRATE JUDGE~~

ATTACHMENT A

Count One

On or about June 10, 2009, within the District of Columbia, defendant **James Wenneker Von Brunn** willfully, deliberately, maliciously, and with premeditation and malice aforethought, did commit murder in the first degree, by killing Stephen Tyrone Johns, within the special maritime and territorial jurisdiction of the United States.

(Murder in the First Degree, in violation of Title 18, United States Code, Section 1111)

Count Two

On or about June 10, 2009, within the District of Columbia, defendant **James Wenneker Von Brunn** knowingly possessed and caused to be present in a Federal facility a firearm, and attempted to do so, with the intent that such firearm be used in the commission of a crime, and in the course of committing such offense killed Stephen Tyrone Johns.

(Killing in the Course of Possession of a Firearm in a Federal Facility, in violation of Title 18, United States Code, Section 930(b) & (c))