AO 91 (Rev. 11/11) Criminal Complaint

# UNITED STATES DISTRICT COURT

for the

District of Columbia

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United States of America

v.

Case No.

BRYAN DOUGLES MOLES DOB: 07/09/1973

Defendant(s)

# CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of	May 31, 2017	in the county of	in the
District of	Columbia	, the defendant(s) violated:	
Code Section		Offense Description	
18 U.S.C. § 922(g)(3)	Unlawful Possession of a Firearm		
22 D.C. Code § 4504.02	Unlawful Transportation of a Firearm		*

This criminal complaint is based on these facts: See attached Affidavit in Support of a Criminal Complaint.

Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 06/01/2017

City and state:

Washington, DC

JANC plainant 's signature Co ち、「大学学校」を行うための eff P. Janczyk, Detective-Sergeant Printed name and title Judge's signature

Robin M. Meriweather, U.S. Magistrate Judge Printed name and title

#### AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

## BRYAN DOUGLES MOLES DOB: 07/09/1973

I, Jeff P. Janczyk, being first duly sworn, depose and state as follows:

# AFFIANT'S BACKGROUND

- 1. I have been a sworn officer of the Metropolitan Police Department ("MPD") since 2004, and I am currently assigned to the Joint Terrorism Task Force. I was previously assigned to the Criminal Intelligence Branch of the Homeland Security Bureau. I also previously held assignments in the Criminal Investigation Division as a Detective, and in the Narcotics Special Investigation Division as a Sergeant. I have received investigative instructions from numerous different schools and I have participated in many firearmsrelated investigations and arrests.
- 2. I am familiar with the facts and circumstances set forth below from my personal participation in the investigation, my review of documentation and publicly-available information, and my conversations with other law enforcement officers. Where the actions, statements, and conversations of others are recounted herein, they are recounted in substance and part, unless otherwise indicated. Where the affidavit contains items in quotation marks, those quotations are based on agent notes and may not be completely verbatim. Because this affidavit is being submitted for the limited purpose of supporting a criminal complaint, I am setting forth only those facts and circumstances necessary to establish probable cause for the issuance of the requested complaint. Unless otherwise indicated, all written and oral statements referred to herein are set forth in substance and in part, rather than verbatim.

### PURPOSE OF AFFIDAVIT

3. This affidavit is in support of a criminal complaint charging BRYAN DOUGLES MOLES ("MOLES"), an unlawful user of a controlled substance, with having knowingly possessed and transported in interstate commerce a firearm, in violation of 18 U.S.C. § 922(g)(3), and with having unlawfully transported a firearm in violation of 22 D.C. Code § 4504.02.

# FACTUAL BASIS SUPPORTING PROBABLE CAUSE

- 4. On or about Wednesday, May 31, 2017, at approximately 12:36 a.m., MPD received information from the Pennsylvania State Police that MOLES was traveling to Washington, D.C., in order to get close to President Trump. Law enforcement later learned that MOLES had left a voicemail message with an acquaintance on May 30 stating that he was heading to 1600 Pennsylvania Avenue, in Washington, D.C., and that he would stay there until he met with President Trump. MOLES stated in the voicemail message that he was a refugee intent on bringing down big pharmacy and big business medicine. He added that that he had a car full of ammunition, survival supplies, batteries, and multiple cell phones. MOLES stated in the message that his purchases over the past six weeks would look pretty suspicious. In another voicemail message to the same acquaintance, MOLES stated that his car looked like Timothy McVeigh or Eric Rudolph was going on a camping trip. (Timothy McVeigh was convicted for his role in the April 19, 1995, bombing of a federal building in Oklahoma City, and Eric Rudolph was convicted of numerous homicides viewed as acts of domestic terrorism.)
- 5. Shortly after, MPD was advised by staff at the Trump International Hotel in Washington, D.C., that MOLES had already checked into the hotel. Staff at the Trump International Hotel reported to MPD that MOLES had asked a parking valet to keep his vehicle secure because it contained two firearms. MPD officers and detectives reported to the Trump International Hotel, and learned from the parking valet that MOLES had specifically reported having a rifle and a handgun in his car. The valet identified the car that MOLES had arrived in to MPD; it was a black 2017 BMW with Pennsylvania tags.
- 6. MPD personnel looked into the rear window of the car and saw inside a black rifle case and a box of ammunition. MPD opened the car using the key fob provided by the hotel valet. The rifle case was unlocked, and it was accessible from the passenger compartment of the car. Inside the rifle case was a Bushmaster AR-15-style semiautomatic rifle. Also inside the rifle case were two 30-round high-capacity magazines (ammunition storage and feeding devices) containing ammunition. The rifle case also contained other rifle accessories and a hospital identification card with MOLES' name and photograph. MPD later learned that MOLES works at a hospital as a physician. MPD conducted a search of the car and recovered from the unlocked glove compartment a Glock 23 semi-automatic pistol. The pistol was loaded with six rounds of .40-caliber ammunition with one round in the chamber.
- 7. Staff at the Trump International Hotel provided MPD with the number of the hotel room that had been assigned to MOLES. MPD personnel, along with two agents from the United States Secret Service ("USSS"), went to the room and knocked on the door. MOLES opened the door, and agreed to speak with law enforcement and let them into his room. MOLES pointed out to law enforcement that he had a loaded firearm magazines in his room. MOLES stated that he had brought the two firearms to Washington, D.C., and that the reason he brought the rifle was for a friend to "trick out" (i.e. customize) for MOLES' son. MOLES explained that he was a recovering alcoholic and had been sober since 2013, and was also previously addicted to marijuana. He explained that he has

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post-traumatic stress disorder related to his time in military service, and that he was unable to take anti-psychotic medications because they made him suicidal. MOLES explained that he self-medicates with marijuana. MOLES informed law enforcement that he had marijuana and a vaporizer smoking device in the bathroom of his hotel room. Law enforcement recovered these items, and smelled marijuana in the bathroom.

8. MOLES stated to law enforcement that he owns over 20 guns at his home in Pennsylvania, including multiple high-powered rifles such as AR-15s and AK-47s. MOLES also remarked that he had previous experience with explosives and pipe bombs, but that he had not messed around with them in years. MOLES stated that he had "pipes" in his home, but did not use them for explosives and instead intended to use them to make pull-up bars for exercise.

9. When law enforcement asked for photo identification, MOLES instructed law enforcement to retrieve the identification from his hotel room safe. Inside the safe was a large amount of cash, and MOLES stated that he had withdrawn around \$10,000 in order to live the life he always wanted before it was too late. MOLES stated that he left \$4.19 in his checking account because the number 419 was significant to him (the Oklahoma City bombing was on April 19, 1995). MOLES explained that he had written a term paper once on Timothy McVeigh.

10. Law enforcement searched MOLES' home in Pennsylvania with the consent of MOLES' wife. Marijuana residue and paraphernalia was found in the garage, along with a large locked safe. Law enforcement learned that the locked safe contains MOLES' numerous firearms, but did not open the safe.

### CONCLUSION

11. Based on the abovementioned facts, I submit there is probable cause to believe that on or about May 31, 2017, MOLES, an unlawful user of a controlled substance, knowingly possessed and transported in interstate commerce a firearm, in violation of 18 U.S.C. § 922(g)(3), and unlawfully transported a firearm in violation of 22 D.C. Code § 4504.02.

JANCZHE Janczyk, Detective Sergeant

Metropolitan Police Department

Subscribed and sworn before me this \_\_\_\_\_ day of June 2017.

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Hon. Robin M. Meriweather United States Magistrate Judge