

AFFIDAVIT

I, William Jordon (hereinafter, "Affiant"), being duly sworn, do state the following:

1. I am a Special Agent with the United States Secret Service (USSS) and have been so employed for 5 years. I have been a law enforcement officer for a total of 13 years. I am currently assigned to the USSS Memphis Field Office, where my duties include investigating and presenting for prosecution violations involving Title 18, U.S.C., Section 871 (Threats against the President)..

2. On August 19, 2008, Joshua Pendergrass filed a report with the Olive Branch, MS Police Department stating that Neal Thomas, a friend, had without Pendergrass' permission, logged onto Pendergrass' MySpace.com profile / account and made threats to blow up a fire station and blow up the President of the United States. Pendergrass' MySpace.com profile / account is known by the Friend ID 151966199.

3. On August 20, 2008, the Olive Branch Police Department contacted the United States Secret Service Memphis Field Office regarding the threat against the President alleged in Pendergrass' complaint. I responded with the Olive Branch Police Department to the residence of Neal Thomas located at 11584 Green Pine Drive, Olive Branch, MS. We met with Neal Thomas' parents Tim and Carla Thomas. Tim and Carla Thomas live in and own the residence. Tim and Carla Thomas told us that Neal Thomas (20 years of age) fled the residence on his moped in the early morning hours of August 20, 2008 after he learned that the Olive Branch Police Department wanted to speak with him regarding Pendergrass' complaint. Tim Thomas also surrendered to the Olive Branch Police Department a disassembled Romarm Yugo 59/66 semiautomatic 7.62 X 39mm assault

rife which was found in Neal Thomas' bedroom by Tim Thomas. Tim Thomas stated that without his knowledge, Neal Thomas recently purchased the rifle at a pawn shop in Memphis, TN with a friend, William Reed.

4. Continuing on August 20, 2008, I spoke with Danielle Handwerker, a friend of Neal Thomas. Handwerker let me listen and record a voice mail she received from Neal Thomas the evening of August 19, 2008. In the voice mail, Neal Thomas admits to hacking into Joshua Pendergrass' MySpace.com profile / account.

5. Continuing on August 20, 2008, I spoke with Lindsey Havard, an acquaintance of Neal Thomas. Havard stated that on August 17, 18, and 19, 2008, she received numerous instant messages from the MySpace.com profile / account of Joshua Pendergrass. Havard stated that Neal Thomas was posing as Joshua Pendergrass and claiming that Neal Thomas had an AK-47 and was going to kill him over a dispute.

6. Continuing on August 20, 2008, I spoke with Joshua Pendergrass. Joshua Pendergrass stated that 2 to 3 months ago, he was with Neal Thomas at Thomas' residence when Neal Thomas, using his own MySpace.com profile / account known by the name Mr. Cheerios, sent an email or instant message to an unknown person known as "Think". Pendergrass said the message contained a direct threat against the President of the United States stating he was going to assassinate the President of the United States like JFK. Pendergrass stated later that evening, Neal Thomas told him how he would steal gasoline in order to drive to Washington, D.C. where he could assassinate the President. Pendergrass said that Neal Thomas claimed to be part of an anti-government group called the "Freedom Fighters." Pendergrass said that Neal Thomas was trying to

acquire firearms. Neal Thomas' MySpace.com profile / account is known by Friend ID 119166066.

7. Continuing on August 20, 2008, I interviewed William Reed. William Reed stated around 10 days prior, he took Neal Thomas to Big Daddy's Pawn Shop, Memphis, TN for the purpose of Neal Thomas acquiring a rifle. Reed stated that Thomas purchased an SKS (AK-47 styled assault rifle). Reed said that Thomas told him he bought the rifle because he feared an invasion or an executive order from the President declaring himself a dictator.

8. Continuing on August 20, 2008, I interviewed Jesse Frazier, a friend of Neal Thomas. Frazier stated that he has heard Neal Thomas state that he wanted President Bush dead. Frazier said he knew that Thomas was trying to buy a rifle. Frazier said he was going to use the rifle in a war against the government. Frazier said that Neal Thomas has a close friend, Barbra Roylance of Olive Branch, MS. Many of the previous interviews I conducted led me to believe that Barbra Roylance would try to assist Neal Thomas in his flight from law enforcement. Barbra Roylance uses a MySpace.com profile / account known by Friend ID 169224521. Roylance's MySpace.com profile / account is listed as an associated Friend on Neal Thomas MySpace.com profile / account.

9. Continuing on August 20, 2008, I looked at Barbra Roylance's MySpace.com profile / account. A message was posted for Neal to contact her. I set up an anonymous MySpace.com profile / account and sent a message to Roylance's profile / account stating "All is ok". I sent the message to prompt Barbra Roylance to respond and possibly reveal Neal Thomas' whereabouts.

10. On August 21, 2008, the Olive Branch Police Department learned from Bancorp South that Neal Thomas' ATM / debit card was used to make two \$102.00 withdrawals in Decatur, AL the afternoon of August 20, 2008.

11. On August 22, 2008 around 6:00pm, I interviewed Barbra Roylance and her mother, Nancy Roylance. Barbra Roylance denied knowing where Neal Thomas might be going and denied receiving any contact from him since he fled on August 20, 2008. Barbra Roylance stated she would not assist Neal Thomas in his flight from law enforcement.

12. On August 23, 2008, I checked my anonymous MySpace.com profile / account and saw it received a message on August 22, 2008 at 9:31pm from a MySpace.com profile / account in the name "jenna" known by MySpace.com Friend ID 407119834. The message read as follows:

"neal? its me – Barbra. i created a fraud account from an unknown computer so nobody can track us. they have a tracker on my phone though so do not call it. im thinking about going to north carolina. RESPOND"

13. Continuing on August 23, 2008, Nancy Thomas, Neal Thomas' mother, called me and told me that she just received a telephone call from Barbra Roylance. Nancy Thomas stated that Barbra Roylance told her she had received messages from Neal Thomas before he fled stating that he was going to the Smokey Mountains in North Carolina in order to take the high ground for his protection against the government's declaration of martial law.

14. On August 24, 2008 at 11:02am, my anonymous MySpace.com profile / account received an email from MySpace.com profile / account "jenna" Friend ID 407119834. The message read as follows:

"they know your headed to the mountains now. leave that area. they got it from my old Myspace account and my mom. yes, they have a tracker on my phone i have to go talk to them again today. i will meet you somewhere away from here. tell me where."

15. Continuing on August 24, 2008 at 3:00pm, I again interviewed Barbra Roylance. Roylance forwarded me copies of emails she received from Neal Thomas' MySpace.com profile / account known by Friend ID 11916606 between the dates of April 27, 2008 and August 4, 2008. In the emails, Neal Thomas tells how he plans on fleeing to the Smokey Mountains in an anticipated conflict between the government and the Freedom Fighters. Neal Thomas also explains how he has purchased a moped with enough cargo room for an assault rifle and ammunition for his flight to the mountains. Barbra Roylance again denied being contacted by Neal Thomas. I did not confront Barbra Roylance about the recent MySpace.com emails in hopes she might reveal more specific details of Neal Thomas' destination.

16. On August 27, 2008 Neal Thomas was interviewed by the affiant and another Secret Service agent. In the interview he admitted that he had purchased an SKS assault rifle because he believed that martial law was about to be imposed in the United States. He admitted that he planned to take the rifle with him to North Carolina, but that his father discovered it prior to his leaving. Thomas admitted leaving for North Carolina because he knew that law enforcement officers sought to interview him. Thomas stated

that he had several encounters with law enforcement officers while in North Carolina and that he lied to them about his reason for being present. He admitted that he had planned to travel to North Carolina because of his belief that martial law was going to be declared in the United States. Thomas stated that he was totally opposed to the formation of a North American Union between the United States, Canada and Mexico and would fight against the imposition of martial law.

17. Thomas denied making a threat against the life of the President of the United States in the presence of Joshua Pendergrass, stating that he did not trust Pendergrass. He did advise that he might have made a threatening e-mail about the President but did not recall specifically doing so. He advised that he sometimes becomes very angry about the government and when this happens, his thinking becomes unclear. He further advised that it was possible for him to have made a threatening e-mail while in a fit of rage.

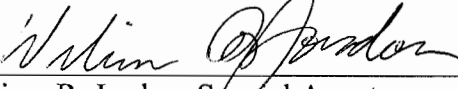
18. Thomas said he became affiliated through MySpace.com with a group or persons claiming to be part of a group called the Rogue Nations Eternal Militia. Thomas said the group has similar beliefs as him. Thomas said members of the group were prepared to fight the government through violence when the time was right. Thomas said he purchased his SKS assault rifle for his protection against the government when martial law is imposed. The subject said he intended to flee to the mountains of North Carolina when he believed the United States was on the verge of collapse. The subject said he intended to use the rifle against United Nations troops enforcing martial law.

19. Thomas said he had been prescribed Adderall and Risperidol for ADHD. He said a Dr. Camp of Olive Branch, MS once told him he had bi-polar disorder and once prescribed him Zyprexa. The subject said he stopped taking Adderall and Risperidol in

September 2007 because he was trying to get into the Army. The subject said he functions better without the medication. He said he was prone to violent outbursts when he was taking the medication. The subject said he has never been committed to a hospital for mental illness. The subject said his current doctor is Dr. Collins of Collierville, TN. He said he would never commit suicide and denies making a threat to kill himself at Kroger after he was fired in June 2007. The subject said he did cut his arm in a suicidal gesture when he was younger. The subject said he thought he heard the voice of God telling him to turn on a road while he was lost and driving through North Carolina. He said he had never heard voices in his head before. Thomas said he has no intentions of taking his medication.

20. Based upon the foregoing, your Affiant submits that there is probable cause that Neal Thomas has made a threat to take the life of and inflict bodily harm upon the President of the United States, in violation of Title 18, U.S.C., Section 871.

FURTHER YOU AFFIANT SAYETH NOT



William R. Jordon, Special Agent
United States Secret Service

Sworn to and subscribed before me this 3d day of September, 2008.



UNITED STATES MAGISTRATE JUDGE