

UNITED STATES DISTRICT COURT

for the

District of Maryland

United States of America)
v.)
Sarah Beth CLENDANIEL)
and)
Brandon Clint RUSSELL)

Case No. 23-mj-00401-MJM

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 January 12 through February 2, 2023 in the county of Baltimore in the District of Maryland, the defendant(s) violated:

Code Section 18 U.S.C. 1366 Offense Description Conspiracy to Destroy an Energy Facility

This criminal complaint is based on these facts:

See affidavit.

Continued on the attached sheet.

Patrick W. Straub

Complainant's signature

Patrick W. Straub, FBI, Special Agent

Printed name and title

Sworn to before me over the telephone and signed by me pursuant to Fed. R. Crim. P. 4.1 and 4(d).

Date: 2 2 23

[Signature]



Judge's signature

City and state: Baltimore, Maryland

Hon. Matthew J. Maddox, U.S Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Special Agent Patrick W. Straub of the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

1. This affidavit is being submitted in support of a Criminal Complaint charging **SARAH BETH CLENDANIEL** and **BRANDON CLINT RUSSELL** with conspiracy to damage an energy facility, in violation of 18 U.S.C. § 1366(a) (Destruction of Energy Facility).

PROBABLE CAUSE

2. I am a Special Agent with the Federal Bureau of Investigation (“FBI”). As such, I am a “federal law enforcement officer” within the meaning of Federal Rule of Criminal Procedure 41(a)(2)(C), that is, a government agent engaged in enforcing the criminal laws and duly authorized by the Attorney General to request a search warrant.

3. I have been a Special Agent with the FBI since January 2005. I am assigned to the Joint Terrorism Task Force (“JTTF”) in the FBI Baltimore Division. The majority of my career has been devoted to investigating, managing, and supporting both international and domestic terrorism investigations, which often involve violations of Title 18 of the United States Code. I have assisted in the preparation of numerous search warrant applications, conducted, or participated in physical and electronic surveillance, assisted in the execution of search warrants, debriefed informants and reviewed other pertinent records. Through my training, education, and experience, I have become familiar with the efforts of persons involved in criminal activity to avoid detection by law enforcement.

BACKGROUND INFORMATION CONCERNING RUSSELL

4. In May of 2017, RUSSELL resided in Tampa, Florida with three roommates when one of them, Devon Arthurs, murdered the other two roommates. **RUSSELL** was not home at the time and was not harmed. During the ensuing response and investigation, police discovered Neo-Nazi paraphernalia, a picture of Oklahoma City bomber Timothy McVeigh, the high explosive hexamethylene triperoxide diamine (“HMTD”) and, among other items, numerous explosive precursors that belonged to **RUSSELL**. During an interview, RUSSELL admitted to subscribing to “National Socialist,” or Nazi, beliefs, that he had started his own local National Socialist Group called the “Atomwaffen,” that his roommates were members of Atomwaffen, and that he had manufactured the HMTD.

5. The Atomwaffen Division (“AWD”) is known to law enforcement to be a US-based racially or ethnically motivated violent extremist (“RMVE”) group with cells in multiple states. The group’s targets have included racial minorities, the Jewish community, the LGBTQ community, the United States Government, journalists, and critical infrastructure. AWD reportedly has international ties. Since the arrest of RUSSELL and other AWD members, the AWD has renamed itself the National Socialist Order (“NSO”).

6. Devon Arthurs was arrested and charged with murdering his two roommates. Arthurs was interviewed by law enforcement agents, and he stated that he had recently converted from Neo-Nazi beliefs to Islam. Arthurs stated that he murdered his roommates because they bullied him over being a Muslim. Arthurs said that **RUSSELL** was the leader of the Neo-Nazi group to which he and his roommates had belonged. Arthurs stated that, before he killed his roommates, they had been planning to attack U.S. infrastructure, to include power lines along

“Alligator Alley” (a nickname for the part of Interstate 75 that crosses South Florida) as well as a Florida nuclear power plant.

7. **RUSSELL** was charged with, and ultimately pleaded guilty to, possession of an unregistered destructive device, in violation of 26 U.S.C. §§ 5841 & 5861(d), and improper storage of explosive materials, in violation of 18 U.S.C. § 842(j). *See* MDFL Case No. 17-cr-00283-SCB-JSS. On January 9, 2018, **RUSSELL** was sentenced to 60 months in prison, to be followed by 3 years of supervised release. **RUSSELL** has served his sentence and is currently on supervised release.

PLOT TO ATTACK ELECTRICAL SUBSTATIONS IN MARYLAND

8. According to reporting from an FBI Confidential Human Source (“CHS-1”), since at least June 2022, the user “Homunculus” on encrypted communication application #1 (“ECA #1”) has encouraged CHS-1 to carry out attacks against critical infrastructure in furtherance of his RMVE ideology. Homunculus has specifically encouraged CHS-1 to attack electrical substations and has provided guidance on how to cause maximum damage. For example, Homunculus made statements in direct messages to CHS-1 throughout much of 2022 regarding conducting critical infrastructure attacks, including statements about sniper attacks against substations, and how conducting a small number of attacks on electrical substations could cause a “cascading failure.” On September 9, 2022, Homunculus encouraged CHS-1 to read a white supremacist publication that provided instructions on how to attack critical infrastructure, and encouraged CHS-1 to use Mylar balloons to short out a power transformer. On October 14, 2022, during a conversation about the use of Mylar balloons, Homunculus told CHS-1 that “putting holes in transformers though is the greatest thing somebody can do.”

9. On October 25, 2022, after CHS-1 had provided photographs of an electrical substation, Homunculus stated that transformers are “custom made and could take almost a year to replace if there isnt [sic] any stocked replacement which they liekly [sic] dont have.” Homunculus also sent a link to the Wikipedia page for “Cascading failure” and asked CHS-1 how cold it gets in CHS-1’s area. Homunculus stated that CHS-1 should carry out an attack “when there is greatest strain on the grid,” like “when everyone is using electricity to either heat or cool their homes.”

10. On November 5, 2022, Homunculus asked CHS-1 if it was snowing in CHS-1’s area yet and added: “i think you should wait until like a week after it starts snowing for that other thing we talked about.” CHS-1 reported that the “other thing” was a reference to an attack on an electrical substation. Homunculus also stated that the “goal is for when most people are using max electricity” and that “follow on [attacks] could lead to cascading failure costing billions of dollars.” CHS-1 replied with an emoji of a shocked rubber duck.

11. On December 3, 2022, Homunculus told CHS-1, “someone else i know in maryland...is gonna be doing same thing as you” and that this would “GREATLY amplify its effects.” During the same conversation, Homunculus confirmed he was referring to the “thing [CHS-1] sent pictures about,” a reference to the photographs of an electrical substation provided by CHS-1 in late October.

12. On January 12, 2023, CHS-1 discussed the planned substation attack and told Homunculus that CHS-1 wanted to “maximize impact” and “[w]ould love to coordinate to get multiple [substations] at the same time.” CHS-1 also alluded to the concept of cascading failure that Homunculus had explained to CHS-1 during previous conversations. Homunculus asked CHS-1 to collaborate with a Maryland-based woman to carry out the attacks. Homunculus

confirmed that the woman was 100 percent “serious and can be trusted.” Homunculus described the woman as a “felon” who “had their weapon stolen” and was struggling to obtain a new weapon. Homunculus asked CHS-1 to assist.

13. According to reporting from CHS-1, later on January 12, 2023, ECA #1 user “Nythra88” (“Nythra”) introduced herself to CHS-1, confirmed she was the individual Homunculus was referring to in the previous conversation, and stated that she lived near Baltimore. As described further below, FBI investigators have identified Nythra as Sarah Beth **CLENDANIEL**. During the conversation, which continued through January 14, 2023, Nythra informed CHS-1 that she had a terminal illness related to her kidneys and was unlikely to live more than a few months, confirmed she is a felon, and stated she had previously, but unsuccessfully, attempted to obtain a rifle. Nythra requested that CHS-1 purchase a rifle for her and that she wanted to “accomplish something worthwhile” before her death, and wanted the rifle “within the next couple of weeks” to “accomplish as much as possible before June, at the latest.” Nythra provided CHS-1 with the encrypted communication application #2 (“ECA #2”) account (@kali1889) and suggested future communication occur there, via voice, or in person.

14. On or about January 18, 2023, CHS-1 engaged in a recorded voice discussion using ECA #2 with @kali1889 (“Kali”). During that conversation, Kali told CHS-1 that she had already identified a few potential locations to target in her attack, including one just across the Delaware state line (with Maryland), in a location that is “literally like a life artery” and would “definitely cut out a lot of shit.” Kali confided that she had just obtained her driver’s license “today” and was not that comfortable driving yet, so CHS-1 stated that CHS-1 would have to be the “driver” and Kali would have to be the “shooter” in the attack. Kali confirmed that she was “determined to do this” and stated she would have done something earlier on her own if she had not lost her rifle “a

few months ago.” Kali told CHS-1 that she had an “eotech with a 4 times magnifier,” which CHS-1 assessed to be a rifle optic. Kali told CHS-1 that she had previously tried to obtain a rifle, a Smith & Wesson M&P 10 Sport, but that had fallen through. Kali told CHS-1 that, if CHS-1 provided her a rifle, CHS-1 should report the rifle as stolen and she would then file off the serial number. Kali emphasized that her time frame for the attack was “no longer than a month.”

15. The above call on ECA #2 experienced technical difficulties, so the recorded voice conversation continued shortly thereafter on ECA #1. During the ECA #1 voice call, CHS-1 and Nythra continued to discuss the specifics of the desired rifle and agreed that Nythra would send CHS-1 a “wish list.” Nythra acknowledged that whatever type of firearms she possessed would be “illegal.” Nythra also stated that she would “really want a silencer for my Glock 9.” FBI investigators believe that Nythra’s reference to a “Glock 9” was regarding a Glock 19, which is a handgun that uses 9-millimeter ammunition. On or about January 19, 2023, Kali sent CHS-1 a wish list of items for her desired rifle that were available for online purchase at www.palmettostatearmory.com, including an “upper,” a “lower” and magazines.

16. On or about January 19, 2023, CHS-1 engaged in a recorded voice discussion with ECA #1 user Homunculus during which they spoke about CHS-1’s conversation the prior day with Nythra. Specifically, they discussed Nythra’s ability to participate in the attack due to her health problems and possibilities regarding acquiring or manufacturing a rifle for her. Homunculus advised CHS-1 that he did not think CHS-1 and Nythra needed to be together at the same location during the attack. When CHS-1 asked whether they would need to attack substations near one other in order to achieve “cascading failure,” Homunculus said it “depends.” Homunculus said he would “look at the map” and get back to CHS-1 about target facilities in a couple of days.

17. On January 21, 2023, CHS-1 exchanged encrypted messages, separately, with Kali on ECA #2 and Homunculus on ECA #1 in which they discussed in more detail the rifle and specific accessories Kali desired. The conversation with Kali extended into January 22, 2023, at which time Kali stated that she already had a “bunch of [.308] ammunition” and several magazines for a rifle. Kali later clarified that she had a “few hundred rounds of ammunition.” Kali also asked CHS-1 to provide her a “decent inner pants holster” for her “9mm” to replace her “other holster” which is a “drop leg holster” and therefore difficult to conceal.

18. On or about January 24, 2023, CHS-1 engaged in a recorded voice discussion on ECA #1 with Nythra that lasted almost two hours. During the call, they discussed, among other things, the following:

- a. Nythra previously had a semi-automatic rifle; however, in approximately October 2022, it was taken by an unnamed individual during an argument when Nythra, her son, and her nephew, were caught trespassing on the individual’s property.
- b. Nythra has threaded and non-threaded barrels for her Glock, which is functional after she purchased a new “slide” for it. Nythra physically has the Glock with her; it is not kept at her mother’s residence. Nythra further explained, “I keep it on me now, like just in case.” Nythra said she would send a picture of it to CHS-1 in the next day or two.
- c. Nythra discussed the ammunition she has, including .308 “full metal jacket” rounds, hollow point nine-millimeter rounds, and approximately 150-200 rounds of “Browning and Winchester.”

- d. Nythra has a “Tri-Star” semi-automatic shotgun with a 10-round magazine that she could use instead of the desired rifle in the “worst case scenario.”
 - e. Nythra commented that her brother has or had some “incendiary rounds” with a green tip. Although expensive, Nythra suggested: “getting that is, uh, I think especially for what we’re talking about doing, just to make sure it’s a solid thing and not just like the oil leaking out but like it’s fully damaged.”
 - f. Nythra stated that she and CHS-1 needed to use “brass catchers,” and she had thought about going to the firearms range to collect shells of different calibers, including .556, that they could spread “there” to send “them” on a wild goose chase. FBI investigators believe that Nythra was suggesting they attach devices called “brass catchers” to their rifles to collect spent shell casings during their planned attack; they would instead leave shell casings of different calibers at their attack locations, so that investigators who responded to the crime scenes could not tie the casings to the actual rifles used by Nythra and CHS-1.
 - g. Nythra was hesitant to discuss targets of the attack with “Raccoon” (another alias for Homunculus) because “he has a lot to lose.” She added: “He’s not like your average regular one of us that’s not known and that’s like a faceless unknown person . . . I try not to involve him wherever possible.” Nythra and CHS-1 discussed physically scoping out some potential attack sites during the first week of February.
 - h. Nythra and CHS-1 further discussed Nythra’s desired rifle for the attack.
19. On or about January 26, 2023, CHS-1 and Homunculus exchanged direct

messages on ECA #1 during which CHS-1 advised he/she had tentatively decided to buy a “pre-made” rifle for Nythra/Kali instead of 3D printing one, and Homunculus replied: “okay sounds good . . . everything else is fine too ;)” When CHS-1 asked if Homunculus was referring to “location”, Homunculus simply replied “yes don’t worry.” CHS-1 stated: “Perfect. That’s the part that I haven’t really done anything on,” to which Homunculus again replied: “yea don’t worry.” Based on the context and previous messages, CHS-1 knows that Homunculus understood that “location” meant the specific substation that would be targeted.

20. On or about January 29, 2023, CHS-1 received a message on ECA #2 from Kali in which Kali stated it “would really be ideal, for us both to have 30 round mags. Especially for what we’re doing.” She asked CHS-1 to “please get us each like, 4 of them. For what I’m hoping to do, we will need them. If we can pull off what I’m hoping... this would be legendary. This is MAJOR tier, and definitely doable.”

21. On or about January 29, 2023, Kali sent CHS-1 via ECA #2 a link to the publicly available webpage “Open Infrastructure Map” (<https://openinframap.org>) and instructed CHS-1 to “look at Baltimore and see if you can figure out what I want to do.” She also stated she wanted “to try to do 5 in one day.” CHS reported that he/she understands that to mean Nythra seeks to attack five electrical substations on the same day.

22. On or about January 29, 2023, Nythra told CHS-1 during a recorded voice conversation on ECA #1 that the five substations she planned to target included: “Norrisville, Reisterstown, and Perry Hall.” Nythra described how there was a “ring” around Baltimore and if they hit a number of them all in the same day, they “would completely destroy this whole city.” Nythra added that they needed to “destroy those cores, not just leak the oil...” and that a “good four or five shots through the center of them . . . should make that happen.” She added:

“It would probably permanently completely lay this city to waste if we could do that successfully.” CHS-1 asked if it would accomplish a “cascading failure” and Nythra replied: “Yes . . . probably” and that the attack targets are all “major ones.” Nythra added that the most difficult target that they would have to do together has “fire walls on three sides.”

23. Nythra also sent CHS-1 five links to the “Open Infrastructure Map,” which is the same website previously disseminated by Homunculus when discussing infrastructure attacks (discussed above), showing the locations of five specific electrical substations in Maryland. Three of the five substations appear to be located near the towns of Norrisville, Reisterstown, and Perry Hall. The remaining two substations are in the vicinity of Baltimore City, MD. CHS-1 reported that he/she understands these five links to show the targets of Nythra’s planned attack. The FBI reviewed the links provided by Nythra, located the substations/areas on Google Maps, and physically visited and photographed each site. Each location is a BGE substation with significant infrastructure. Based on my training and experience, and via open source research, I know that BGE is an energy company that utilizes substations, like the five targeted sites, to produce, convert, transform, regulate and distribute energy.

24. On or about January 31, 2023, CHS-1 and Homunculus communicated via encrypted chat on ECA #1. CHS-1 told Homunculus that he/she had “read about a few attempt [sic] recently that didn’t have much effect, so I want to make sure it’s done right.” Homunculus replied “Yea, it has been studied . . . So don’t fret.” CHS-1 asked about “These specific 5?” to which Homunculus replied: “Look at the map dude.” CHS-1 responded: “So that’s the part I don’t get. What’s with the one all the way up by Pennsylvania? Does that have something to do with the cascading?” Homunculus replied: “Watch this video” and provided a YouTube link to a video captioned “Grid vs. Gunfire” that discussed “What Really Happened with the Substation

Attack in North Carolina.” After watching the video, CHS-1 commented that he/she is looking at the map and “I think I get it . . . But I only see four lines. Not fully getting the fifth. Is the one up north to stop rerouting? You know the one I’m talking about?” Homunculus replied: “Yrs [sic]... It’s a hard one though . . . Look at it from google maps.” After indicating he/she had pulled the location up on the map, CHS-1 replied “It looks like it’s in a pretty rural area . . . Good road access . . . Wooded areas . . . I would like it to be closer to a major highway, but that has its ups and downs. Homunculus replied: “Yea . . . Hard part is they have 3 sided firewalls . . . Look at them.” CHS-1 replied: “Oh shit. Yea this is that one. Our friend mentioned that one did but she didn’t say which one.”

25. Based on my training and experience, as well my knowledge of the facts in this investigation, I understand the above chat between CHS-1 and Homunculus to be a discussion of the five substations that Nythra had previously identified as targets for her attack with CHS-1. One of the five substations identified by Nythra is in a rural area of Maryland near the Pennsylvania border. In addition, Nythra described a substation as being surrounded by “fire walls” on three sides, which is the same language Homunculus used to describe the facility near Pennsylvania on January 31, 2023. As a result, I submit that there is probable cause to believe that Nythra and Homunculus discussed potential target locations and jointly selected the five attack targets that Nythra shared with CHS-1.

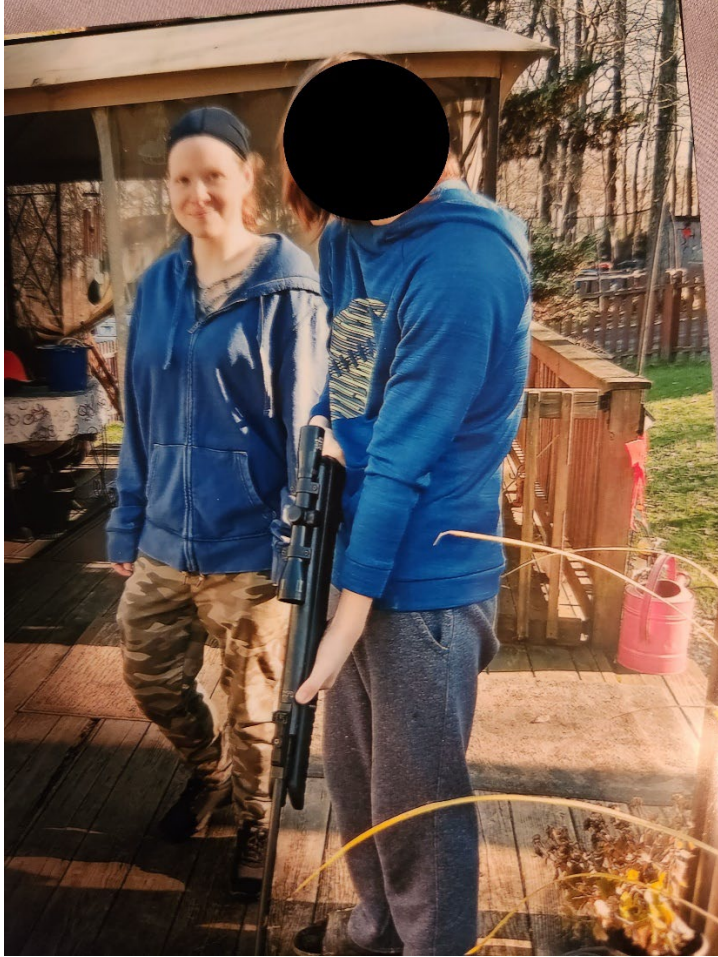
26. The FBI received records from Google on January 30, 2023, and January 31, 2023, pursuant to a search warrant targeting accounts used by **CLENDANIEL**.¹ A preliminary review of a portion of these records revealed additional evidence of **CLENDANIEL**’s criminal activities and her identity as “Kali1889” and “Nythra88. For instance, the records included

¹ The search warrant was issued by United States Magistrate Judge for the District of Maryland A. David Copperthite on January 27, 2023. *See* No. ADC- 23-349.

several photographs of ammunition, an “eotech” firearm sighting accessory, and a woman physically resembling **CLENDANIEL** in possession of or with easy access to firearms or firearm accessories, including one shown below with what appears to be a minor holding a firearm.² One photograph depicted a woman believed to be **CLENDANIEL** wearing tactical gear containing a swastika, holding a rifle and with a pistol in a drop holster on her left leg:



² I have compared the photographs to **CLENDANIEL**'s Maryland Department of Motor Vehicles photograph and believe them to be photographs of the same person.



27. The Google records also contained screenshots of a document that states that it is not a manifesto; however, the FBI assesses that it contains many aspects that would be included in a manifesto. The document starts: “If this is being posted online, I can only hope that some of

my plans were at least partially successful.” The document references Kaczynski, Brevic, Hitler³ and others while stating that “I would sacrifice ****everything**** for my people to just have a chance for our cause to succeed.” The document later states: “Unfortunately, I have very little experience with firearms. But once I get my license, I hope to get at least a couple hours of practice in . . . What a shame I don’t have a rifle yet. This storm would be the perfect time to hit some substations and knock out power.”⁴

***CLENDANIEL** is “Nythra88” on ECA #1 and “@kali1889” on ECA #2*

28. The FBI has been aware of **CLENDANIEL**’s relationship with the user of Homunculus, identified as **RUSSELL** (explained below at paragraphs 33 - 36) since at least 2018 when they were corresponding with each other while they were both incarcerated in separate facilities. In or about November 2022, if not earlier, the FBI had tentatively identified the user of the online monikers “Kali” and “Nythra88” as **CLENDANIEL**. This identification is further corroborated by the above-described voice conversations, as more fully explained below.

29. Specifically, Nythra/Kali disclosed certain details about her life to CHS-1 during the voice conversations on January 18, 2023, that correspond with **CLENDANIEL**. For instance, she stated that her mother lives in North East, Maryland but that she lives near Baltimore with a roommate. Second, Nythra/Kali stated that she had just obtained her driver’s license “today” Finally, Nythra/Kali disclosed that her prior felony conviction was for armed robbery of a convenience store with a “machete,” which she had committed while under the influence of

³ The FBI understands these to be references to Ted Kaczynski, aka the Unabomber, who was arrested in 1996 for a series of mail bombings in the United States; to Anders Breivik, who was convicted in 2012 in the Netherlands for committing terrorist attacks; and to Adolph Hitler.

⁴ Based on the fact that **CLENDANIEL** only recently obtained a driver’s license, I believe that the reference to “license” is a reference to her driver’s license.

drugs.

30. A review of Maryland Motor Vehicle Administration (MD MVA) records revealed that **CLENDANIEL**'s Maryland driver's license was issued on January 18, 2023, and her address was listed as an address known to the FBI in North East, Maryland, where her mother currently resides (hereinafter, "Subject Address 1"). A review of **CLENDANIEL**'s criminal history reflects a 2006 arrest for numerous offenses, including armed robbery, that resulted in a felony robbery conviction. **CLENDANIEL** was sentenced for this incident in approximately December 2006 to five years of imprisonment with two years suspended. The FBI reviewed a police report from this May 2006 incident, and the report indicated that **CLENDANIEL** had been arrested for her involvement in a robbery at a convenience store, during which she wielded a "large butcher knife." At the time of her arrest, officers observed "track marks, cuts and infections on both" of her arms.

31. Review of open source databases revealed that a woman believed to be **CLENDANIEL**'s mother, 72 years old, currently resides at Subject Address 1 in North East, Maryland, in Cecil County. Police reports previously reviewed by the FBI revealed that, on September 13, 2022, the resident at a different address known to the FBI in Catonsville, Maryland (hereinafter, "Subject Address 2"), had reported that **CLENDANIEL**, who was his "girlfriend," had temporarily gone missing and he provided a telephone number for **CLENDANIEL** that ended in -0728. Catonsville, Maryland is in Baltimore County and is physically located close to the city of Baltimore. The FBI reviewed information on or about January 20, 2023, from the state of Maryland regarding **CLENDANIEL**'s probation status. This information reflected that **CLENDANIEL**'s most recent contact with her probation officer was January 13, 2023, during which **CLENDANIEL** advised she was still dealing with kidney

disease. Her listed phone numbers were a phone number ending in -6453 and the same phone number ending in -0728 referenced above. Her address was listed as Subject Address 2, where she lives with her “friend.”

32. Based on all of the above, I submit that there is probable cause to believe **CLENDANIEL** is “Kali1889” and “Nythra88.”

***RUSSELL** is “Homunculus” on ECA #1 and Uses the Online Moniker “Raccoon”*

33. An FBI employee who listened to **RUSSELL**’s recorded phone calls while he was incarcerated has also listened to the recorded voice conversations between CHS-1 and Homunculus. That FBI employee believes that Homunculus and **RUSSELL** are the same person based on a voice comparison.

34. In addition, among the records obtained from Google pursuant to the search warrant are photographs of a cell phone screen displaying text messages between “Raccoon” and “Irkalla.” In the messages, Raccoon refers to Irkalla on multiple occasions as “Kali,” and, on one occasion, Irkalla refers to Raccoon as “Brandon.” In that same conversation, the two discussed having kids together, and mentioned “warfare” and “illegal things.” Raccoon stated that “going to prison was worth it because I might not have met you otherwise.”

35. In a message on ECA #1 dated July 2, 2022, Homunculus stated that “yesterday,” *i.e.*, July 1, was Brandon Russell’s birthday. Criminal history records for **RUSSELL** indicate that **RUSSELL**’s birthday is July 1. Based on the FBI’s review of these messages, it appears that Homunculus was stating in the ECA #1 messages that he was, in fact, **RUSSELL**.

36. As previously discussed at paragraph 28, the FBI has been aware of **CLENDANIEL**’s association with **RUSSELL** since 2018 and knows their relationship has persisted beyond their time in prison. For example, according to records obtained from Amazon,

CLENDANIEL's Amazon account was used to purchase items that were shipped, or scheduled to be shipped, to **RUSSELL** at his known residential address with **RUSSELL** in Orlando, Florida.⁵ One such purchase was in May 2022, and another was in August 2022. The purchase for and shipment to **RUSSELL** in May 2022 was for a 34-piece "Professional Pocket Picking Hand Tool" set that is for "Hasp Storage, Fence, Gate, Gym, Locker, Sports Locker." It is also worth noting that **CLENDANIEL** purchased the same exact item for herself, on the same day, but the order quantity was listed as "0" and the records suggest that the product was never shipped.

Conclusion

37. Based on the above information, I believe probable cause exists to support the issuance of a Criminal Complaint charging **SARAH BETH CLENDANIEL** and **BRANDON**

⁵ Bureau of Prisons records reflect that location as **RUSSELL**'s address as of the time of his release from prison in 2021. In addition, FBI personnel conducting physical surveillance have observed **RUSSELL** coming and going from that address as recently December 22, 2022.

CLINT RUSSELL with conspiracy to damage an energy facility, in violation of 18 U.S.C. § 1366(a) (Destruction of Energy Facility).

Respectfully submitted,



Patrick W. Straub, Special Agent
Federal Bureau of Investigation

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 41(d)(3) this 2nd day of February, 2023.



THE HONORABLE MATTHEW J. MADDOX
UNITED STATES MAGISTRATE JUDGE