

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA

CRIMINAL COMPLAINT

UNITED STATES OF AMERICA

v.

ALLEN WAYNE DENSEN MORGAN

MAG 13 **313**
CASE NUMBER:

I, [REDACTED], the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about August 25, 2013, in Calhoun County, in the Northern District of Alabama, defendant ALLEN WAYNE DENSEN MORGAN, did use and did cause to be used a facility of interstate commerce, that being, a motor vehicle and a telephone, with intent that the murder of [REDACTED] be committed in violation of the laws of the State of Alabama, as consideration for the receipt of a thing of value, that being a necklace and a watch, in violation of Title 18, United States Code, Sections 1958.

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

(See attached Affidavit)

[REDACTED SIGNATURE]
Signature of Complainant

Special Agent, Federal Bureau of Investigation

Sworn to before me and subscribed in my presence,

August 26, 2013
Date

T. Michael Putnam
United States Magistrate Judge
Name and Title of Judicial Officer

at Birmingham, Alabama
City and State
[Signature]
Signature of Judicial Officer

AFFIDAVIT

I, [REDACTED], a Special Agent of the Federal Bureau of Investigation (FBI), being duly sworn, depose and state the following:

1. I have been employed as a Special Agent (SA) with the Federal Bureau of Investigation (FBI) for over 16 years and am currently assigned to the Birmingham, Alabama Division. During my career, I have investigated a variety of federal criminal violations, including allegations involving murder for hire.

2. This affidavit is made in support of an application for a criminal complaint against ALLEN WAYNE DENSEN MORGAN. As will be shown below, affiant believes there is probable cause to believe that MORGAN attempted to hire an individual to murder [REDACTED] in violation of Title 18, United States Code, Section 1958.

3. The facts set forth in this affidavit are based on information I personally have obtained during the course of my investigation which was initiated on August 22, 2013. It is also based on information provided to me by FBI Special Agent [REDACTED] and other FBI personnel working as undercover employees (UCE).

THE INVESTIGATION

4. On August 22, 2013 at approximately 10:15 a.m., FBI UCE #1, who purported himself to be a member of the Ku Klux Klan, telephonically contacted ALLEN WAYNE DENSEN MORGAN to verify MORGAN's desire to hire someone to murder [REDACTED] a man MORGAN

believes raped his wife, [REDACTED] days earlier. During the initial moments of the telephone call, MORGAN excitedly told UCE #1 he had just confronted [REDACTED] outside a house near his residence of [REDACTED], Munford, Alabama. As [REDACTED] sat in the passenger seat of a Jeep, MORGAN described how he confronted [REDACTED] with his wife's laser equipped semi-automatic pistol. MORGAN said he attempted to force a confrontation by firing multiple rounds of ammunition at [REDACTED]. Though he fired several shots, MORGAN said it was not his intent to kill [REDACTED] in that moment as several people were present. [REDACTED] fled on foot as MORGAN fired several shots in the ground beside him in an effort to intimidate him. MORGAN assessed that [REDACTED] must be guilty of the rape of his wife because [REDACTED] never tried to defend himself by standing his ground or offering to reason with MORGAN. MORGAN described himself as an expert marksman who could have killed [REDACTED] had he chosen to do so.

5. UCE 1 advised that he was traveling and en route to Tennessee to pick up a partner to take care of this matter for MORGAN. UCE 1 reassured MORGAN that he had reached out to the right people and wanted him to settle down. MORGAN then advised that his wife, [REDACTED] is a patient at Mountain View Hospital and described "her alibi" as being "air tight." MORGAN suggested that he also considered checking himself into a V.A. hospital or set up some sort of appointment to give himself an alibi. MORGAN agreed to meet with UCE1 and UCE2 on Sunday, August 25, 2013 at a location to be determined.

6. MORGAN advised that he and his family are supportive of the plan to murder [REDACTED]. His father in law, [REDACTED] and mother in law [REDACTED] want to dynamite the entire block.

7. MORGAN described how he wanted [REDACTED] murdered by stating, "I want this man hung from a tree like he is an animal. I want his dick cut off and I want him cut...You're a hunting man right?...I want him hung from a tree and gutted and left him hung in that tree.. You don't have to leave him hanging in that tree. But, that's how I want him to die. Die a slow painful death and that's it. You know what I'm saying." The UCE confirmed were not roughing anyone up, we are talking dead. When they give us a call and give us a green light that's what we are going for. Just want to make sure you're good with that.

8. MORGAN told UCE 1 he would discuss payment for the murder-for-hire on Sunday, August 25, 2013 when they meet.

9. On Sunday, August 25, 2013 at approximately 3:30 p.m., MORGAN met UCE 1 and UCE 2 at the Econo Lodge motel at 25 Elm Street, Oxford, Alabama. MORGAN told the UCEs that he would pay them money to commit the murder of [REDACTED] but during the conversation he advised he had no money. MORGAN said that because he is a disabled (United States Army) veteran, his wife has control of his monthly check. MORGAN provided the UCEs with directions to [REDACTED] residence in Munford, Alabama on a printed Google map provided by the UCEs. MORGAN also provided the UCEs with information describing [REDACTED]

physical characteristics and indicated that his picture could be easily obtained from a sex offender website. He then offered as payment to the UCEs, a watch and a necklace from his person.

Additionally, MORGAN offered to tender as additional payment, a firearm located at his residence as payment.

10. At the conclusion of the meeting MORGAN was taken into custody. MORGAN was later questioned after being advised of his Miranda rights. MORGAN confessed that he intended to hire the UCE to kill [REDACTED]. The affiant prepared a typewritten statement of MORGAN's confession. MORGAN reviewed the statement and acknowledged that reflected his actions in detailing the scheme to kill [REDACTED].

11. Based on the foregoing, there is probable cause to believe that ALLEN WAYNE DENSON MORGAN has used a facility of interstate commerce, with the intent that a murder be committed in violation of Title 18, United States Code, Section 1958.

[REDACTED]

Sworn to and signed before
me this 26th day of August, 2013

[REDACTED]

[Signature]
USMJ.