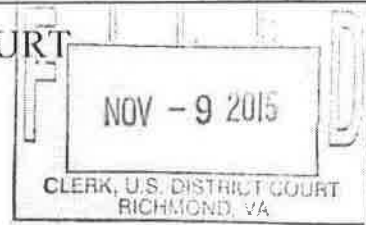


AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Virginia



United States of America  
v.  
Charles D. HALDERMAN

Case No. 3:15mj271

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 in October to November 8, 2015 in the county of Richmond City, Virginia in the Eastern District of Virginia, the defendant(s) violated:

*Code Section*  
18 U.S.C 1951

*Offense Description*  
Conspiracy to commit Hobbs Act robbery

This criminal complaint is based on these facts:

Affidavit of Special Agent James Rudisill, FBI

Continued on the attached sheet.

*Complainant's signature*

James Rudisill, Special Agent FBI  
*Printed name and title*

Sworn to before me and signed in my presence.

Date: 11/09/2015

*/s/ [Signature]*  
Roderick C. Young  
United States Magistrate Judge  
*Judge's signature*

City and state: Richmond, Virginia

United States Magistrate Judge  
*Printed name and title*


AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, James R. Rudisill, depose and say as follows:

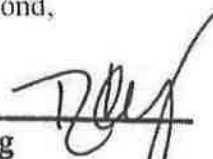
1. Your Affiant has been a Special Agent with the FBI since 2012. Your Affiant is an investigative or law enforcement officer within the meaning of Title 18, United States Code, Section 2510(7) and is empowered by law to conduct investigations and make arrests for offenses enumerated in Title 18, United States Code, Section 2516. In Your Affiant's capacity as a FBI Special Agent, Your Affiant has participated in numerous counterterrorism and criminal investigations, which have involved the use of a variety of law enforcement techniques, including confidential sources and undercover officers, physical surveillance, electronic surveillance, wire surveillance, pen register and telephone toll analysis, Title III intercepts, investigative interviews, the preparation and execution of search and arrest warrants, and reviews of numerous taped conversations involving criminal activity.
2. I present this affidavit in support of a criminal complaint alleging a violation of Title 18, United States Code, Section 1951, that is, conspiracy to commit Hobbs Act robbery, by Charles Daniel HALDERMAN.
3. The information contained in this affidavit is either based on Your Affiant's personal knowledge and observations, the knowledge and observations of cooperating sources and sources of information, or information relayed to your affiant by other federal and state law enforcement officers (collectively referred to as "Agents"). Information and intelligence provided in the investigation by confidential sources and/or sources of information has proven reliable, and when possible has been verified by physical surveillance and other investigative techniques. This affidavit is not intended to include every fact and matter known to your affiant or the United States of America and I have set forth only those facts necessary to support probable cause for the alleged violation.
4. In October 2015, during recorded meetings with Robert Curtis DOYLE, DOYLE outlined a series of plans that he and his associates want to carry out acts in furtherance of their extremist beliefs, up to and including robbing and killing a local silver/jewelry dealer, robbing an armored car, and doing harm to a gun store owner in Virginia. DOYLE asserted that he wanted to use the proceeds from the illegal acts to purchase land, stockpile weapons, and train for the coming race war.

5. Also in October 2015, Doyle was recorded saying that Ronald CHANEY and Charles Daniel HALDERMAN were involved in the plan to rob the jeweler. DOYLE stated that CHANEY will do "whatever, and so will HALDERMAN." DOYLE then continued by saying that HALDERMAN is just young, and all he has to do is put the tools in HALDERMAN's hands. DOYLE said that HALDERMAN is a soldier and that if they come up with a concrete plan and tell HALDERMAN what it is for, HALDERMAN "is game."
6. On Sunday, 10/25/2015, DOYLE met with two FBI undercover agents and discussed future precious metals purchases by DOYLE. CHANEY arrived at the meeting with DOYLE but did not participate, and stayed in DOYLE's red Toyota Tundra. At the meeting, DOYLE purchased \$200 worth of coins. DOYLE also placed an order for \$50,000 in diamonds, \$30,000 in gold, and \$20,000 in silver to be paid by DOYLE and delivered by the undercover agents at a later date. DOYLE and CHANEY left the meeting together in the red Toyota Tundra. During DOYLE's interview, he stated there were hundreds of thousands of dollars of items in the jeweler's office.
7. On 11/2/2015, HALDERMAN was recorded being asked if DOYLE spoke with him about what "they" were doing. HALDERMAN immediately responded in the affirmative, clarifying that he had spoken to DOYLE about it.
8. The jewelry store is mentioned again during an FBI recorded session on 11/2/2015. HALDERMAN engaged in the discussion about the jeweler. HALDERMAN stated that he does not have a pistol and that is his only problem with everything is not having a pistol. HALDERMAN said he has no problem "going up in there." HALDERMAN again provided that his only downfall is not having a pistol, that he has bills to pay too, and no vehicle. HALDERMAN said that he is hungry and is a soldier.
9. On 11/3/2015, HALDERMAN provided in a recorded conversation about the plan to rob the jeweler that "we all" have to sit down and get together. When asked who all was in, HALDERMAN said that he is "firm."
10. According to his computerized criminal history, HALDERMAN had seventeen (17) felony convictions prior to his arrest on 11/8/2015 for Conspiracy to Commit a Hobbs Act robbery.

11. Based on the information outlined in this affidavit, there is probable cause to believe that beginning in October 2015, and continuing to on or about November 8, 2015, in the Eastern District of Virginia, and within the jurisdiction of this Court, Charles Daniel HALDERMAN conspired with others, known and unknown, to commit Hobbs Act robbery, in violation of Title 18, United States Code, Section 1951.

  
James R. Rudisill  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me this 9<sup>th</sup> day of November, 2015, Richmond,  
Virginia

Is/   
Roderick C. Young  
United States Magistrate Judge