

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA  
ORLANDO DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

vs.

CASE NUMBER: 6:08-MJ-1128

KEVIN CHRISTOPHER BROWN

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about April 1, 2008, in Orange County, in the Middle District of Florida, defendant(s) did,


knowingly and willfully attempt to place or attempted to have placed on an aircraft an explosive or incendiary device

in violation of Title 49, United States Code, Section(s) 46505(b)(3). I further state that I am a(n) Task Force Agent with Federal Bureau of Investigation, and that this Complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT

Continued on the attached sheet and made a part hereof:  Yes  No

**FILED**  
**ORLANDO, FL**  
**4/2/08**  
**U.S. MAGISTRATE JUDGE**

  
Signature of Complainant  
Kelly J. Boaz

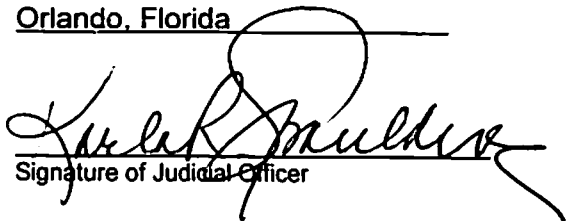
Sworn to before me and subscribed in my presence,

April 2, 2008

at

Orlando, Florida

The Honorable Karla R. Spaulding  
United States Magistrate Judge  
Name & Title of Judicial Officer

  
Signature of Judicial Officer

**STATE OF FLORIDA**

**Case No: 6:08-MJ-1128**

**COUNTY OF ORANGE**

**AFFIDAVIT IN SUPPORT OF COMPLAINT**

The affiant, Task Force Agent Kelly J. Boaz, of the Federal Bureau of Investigation (hereinafter referred to as "FBI"), being duly sworn, states:

**INTRODUCTION**

1. I have been employed with the Orange County Sheriff's Office since 1989, and am currently assigned to work as a Task Force Agent with the FBI. During the last 10 years I have been assigned to the OCSO Bomb Squad, where I am charged with responding to suspicious devices and rendering safe unknown or explosive materials. I have attended FBI's Hazardous Device School, ATF's Advanced Explosive Detonation School, the U.S. Department of Energy's Nuclear Handling Agents School, and other courses regarding explosives. I am also an adjunct professor at the University of Texas A&M and teach courses in unexploded ordinance and explosive breaching.

2. I make this affidavit based upon information provided to me by FBI agents, Orlando Police Department (hereinafter referred to as "OPD") officers and Transportation Security Administration (hereinafter referred to as "TSA") employees and others. This affidavit does not contain all facts known to me, but only those facts I believe are necessary to establish probable cause for the arrest of **KEVIN CHRISTOPHER BROWN**.

3. On or about April 1, 2008, **BROWN** entered the Orlando International Airport (hereinafter referred to as "OIA"), in Orlando, Florida, and checked in to board an Air Jamaica flight that was supposed to depart OIA at approximately 2:55 p.m.

**BROWN** gave baggage to an Air Jamaica employee that he intended be loaded onto the aircraft.

4. Before **BROWN's** baggage would be placed onboard the aircraft, TSA employees searched **BROWN's** baggage and found, among other things, two galvanized pipes, end caps with holes drilled into them, two glass bottles containing nitro-methane, two prescription bottles filled with BB's, one model rocket ignitor, several AA batteries, one six-volt lantern battery, lighters, lighter fluid, and instructions on how to make explosives.

5. TSA and OPD located **BROWN** in the OIA main building and detained him on suspicion of possessing bomb making equipment. FBI and Orlando Fire Department (hereinafter referred to as "OFD") were notified and went to the OIA to assist with the investigation. OFD removed a backpack from **BROWN**, which contained, among other things, instructions and diagrams on how to make a pipe bomb using items similar to the ones found in **BROWN's** luggage.

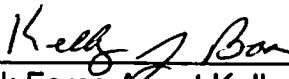
6. After determining that the backpack contained no explosives and safely securing the items in **BROWN's** luggage, I met with **BROWN** and advised him of his *Miranda* rights. **BROWN** knowingly and willfully waived his *Miranda* rights and agreed to speak with agents about the items in his baggage and backpack. **BROWN** told us, among other things, that he bought the items in the baggage in Gainesville, Florida, and intended to use them to build a pipe bomb. **BROWN** initially said that he was going to detonate the device on a tree stump in Jamaica, but later told us he was going to show friends how to build explosive devices like the kind he saw in Iraq. **BROWN** confirmed

that the nitro-methane was an incendiary device that was going to be used as the detonator for the pipe bomb. Finally, **BROWN** told us that agents would find the nitro-methane in vodka bottles, which he hoped would disguise the true nature of the liquid if examined by the TSA.


7. Based on my training, experience, and this investigation, the items found in **BROWN's** baggage constitute an incendiary device, that is the nitro-methane was in a breakable container and the model rocket ignitor would act as the wick, which **BROWN** could carry or throw acting alone. I also believe that when all of the components were assembled, **BROWN** could have made a pipe bomb.

8. Accordingly, based on the foregoing, I believe probable cause exists to charge **KEVIN CHRISTOPHER BROWN** with violating Title 49, United States Code, Section 46505(b)(3), attempting to place and attempting to have placed on an aircraft an explosive or incendiary device.

Further your affiant sayeth not.

  
\_\_\_\_\_  
Task Force Agent Kelly J. Boaz  
Federal Bureau of Investigation

Subscribed and sworn to before  
me in my presence on the  
20 day of April 2008

  
\_\_\_\_\_  
The Honorable Karla R. Spaulding  
United States Magistrate Judge