

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

V.

HATCHET M. SPEED,

Defendant.

DECLARATION OF SPECIAL AGENT CHRISTON TURNER

I, Christon Turner, hereby declare and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been since August 1, 2021. I am a member of the Joint Terrorism Task Force. In my duties as a Special Agent, I currently focus on national security matters and counterterrorism investigations. Currently, I am tasked with investigating criminal activity in and around the U.S. Capitol grounds on January 6, 2021. As an FBI Special Agent, I am authorized by law or by a Government agency to engage in or supervise the prevention, detection, investigation, or prosecution of a violation of federal criminal laws.

2. I am one of the case agents assigned to the investigation and prosecution of the defendant, Hatchet M. SPEED. I submit this declaration for the limited purpose of providing the Court with information that the government relies upon in its motion for conditions of release to preclude SPEED from possessing or having access to firearms or other dangerous weapons during the pendency of this case. This declaration does not set forth all of my knowledge about this matter.

A. Charges Against SPEED for Unlawful Conduct at the U.S. Capitol on January 6, 2021

3. On June 21, 2022, the United States Attorney's Office for the District of Columbia charged SPEED with offenses related to his participation in the incursion at the U.S. Capitol on January 6, 2021. Specifically, SPEED has been charged by criminal complaint with violating 18 U.S.C. § 1752(a)(1)-(2) (knowingly entering or remaining in any restricted building or grounds without lawful authority to do so and engaging in disorderly or disruptive conduct in a restricted building or grounds), and 40 U.S.C. §§ 5104(e)(2)(D) and (G) (engaging in disorderly or disruptive conduct in any of the Capitol Buildings with the intent to impede, disrupt, or disturb the orderly conduct of a session of Congress and/or parading, demonstrating, or picketing in any of the Capitol Buildings).

4. In support of the criminal complaint, I submitted an affidavit describing some of the evidence that SPEED committed those offenses, including Google locational data, admissions that SPEED made to an FBI undercover employee (UCE-1), and video footage of SPEED inside the U.S. Capitol.

B. SPEED's Firearm Purchases After January 6, 2021

5. The FBI has obtained evidence that, in the months following January 6, 2021, SPEED purchased numerous firearms and firearm parts. In a meeting with an FBI undercover employee (UCE-1), SPEED made comments suggesting that he was "panic buying" during this time.

6. As reflected in ATF Form 4473s completed at the time of sale, SPEED purchased at least twelve firearms between February 11, 2021, and May 26, 2021:

- a. On February 11, 2021, SPEED purchased an FN 509 (9mm pistol) from Vienna Arsenal;

- b. On February 15, 2021, SPEED purchased a Smith & Wesson Mod 10-6 (.38 SPL revolver) from Herndon Arms;
- c. On March 12, 2021, SPEED purchased a Glock 27 (.40 pistol), Mossberg 590 Shockwave (12-gauge shotgun), and Tikka T3X (6.5 Creedmoor rifle) from Vienna Arsenal;
- d. On March 30, 2021, SPEED purchased a Sig Sauer MCX (.300 Blackout pistol) and a Benelli Supernova (12-gauge shotgun) from Vienna Arsenal;
- e. On April 30, 2021, SPEED purchased a Sig Sauer Virtus (multiple caliber rifle) and Walther P22 (.22 pistol) from Vienna Arsenal;
- f. On May 21, 2021, SPEED purchased an S&W Mod 60 (.38 SPL revolver) and S&W Mod 36 (.38 SPL revolver) from Vienna Arsenal;
- g. On May 26, 2021, SPEED purchased a Sig Sauer MCX Virtus (5.56 pistol) from Vienna Arsenal.

7. Financial statements and other evidence collected in the course of the investigation reveal that SPEED purchased more than \$50,000 at firearm and/or firearm part retailers, including the purchase of the twelve firearms described above, in the months after January 6, 2021. For example, financial statements from one of SPEED's credit cards show that, just in the one-month period between February 15, 2021, and March 16, 2021, SPEED made the following purchases at firearms and/or firearm part retailers:

- a. February 16, 2021 – \$4,109.00 at Silencer Shop in Texas;
- b. February 16, 2021 – \$980.41 at Alamo Ammo in Texas;
- c. February 16, 2021 – \$207.00 at Trex Arms in Tennessee;
- d. March 3, 2021 – \$668.99 at Reeds Family Outdoors in Minnesota;
- e. March 8, 2021 – \$194.90 at Greenacres Sporting Goods in Florida;
- f. March 8, 2021 – \$5,389.97 at OpticsPlanet, Inc., in Illinois;
- g. March 8, 2021 – \$100.42 at OutdoorLimited.com in North Carolina;
- h. March 8, 2021 – \$215.31 at SG Ammo LLC in Oklahoma;
- i. March 9, 2021 – \$1,137.29 at Ammo Freedom in Texas;
- j. March 10, 2021 – \$1,919.99 at Guns Dot Com in Minnesota;
- k. March 11, 2021 – \$80 in MidwayUSA in Missouri;
- l. March 11, 2021 – \$4,207.13 at SP & G Shooting Range in Virginia;
- m. March 12, 2021 – \$660.99 at OutdoorLimited.com;
- n. March 12, 2021 – \$290.74 at Armageddon Gear LLC in Georgia;
- o. March 12, 2021 – \$297.80 at Freedom Munitions in Idaho;

- p. March 12, 2021 – \$189.46 at EuroOptic Ltd Online in Pennsylvania;
- q. March 12, 2021 – \$695.00 at ESAD Arms LLC in Texas;
- r. March 14, 2021 – \$568.00 at MidwayUSA in Missouri;
- s. March 14, 2021 – \$374.12 at Silencer Shop in Texas;
- t. March 15, 2021 – \$328.95 at Peak Case in Utah.

8. The investigation has further revealed that SPEED is a holder of a Resident Concealed Handgun Permit issued by the Fairfax County Circuit Court.

C. SPEED's Statements to the FBI Undercover Employee (UCE-1) Indicating that He Is a Danger to the Community

9. In February 2022, UCE-1 met SPEED at a coffee shop in Vienna, Virginia. Since that initial interaction, SPEED and UCE-1 have met on multiple occasions. UCE-1 has presented to SPEED as a like-minded individual. Over the course of these meetings, SPEED has made comments indicating he is a danger to the community. As illustrated below, these comments included statements that glorified violence, expressed admiration for convicted domestic terrorists, and justified the use of violence in furtherance of his anti-government and anti-Semitic beliefs.

10. During the initial interaction with UCE-1, SPEED described the group known as the "Proud Boys,"¹ its history, and its role in altercations with Antifa. SPEED then stated that he was "looking for resistance groups." He continued, "I'm looking for people who are willing to say how do we do something more than just complaining on Telegram, which I'm guilty of. I scroll through Telegram way too much. You know. But, you know, what do we do in the real

¹ Proud Boys are a self-described "Western Chauvinist" fraternal organization, some of whose members have committed violence against perceived adversaries at First Amendment-protected events in the United States. The Proud Boys are a national organization with many, largely autonomous U.S. chapters and some activity in other Western countries. The group has an initiation process for new members, who often wear yellow and black polo shirts or other apparel adorned with the Proud Boys logo to events.

world to make something really happen.” In another interaction, SPEED indicated that he went to the Capitol on January 6 with friends who were members of the Proud Boys, with whom he keeps in contact. Describing the Proud Boys’ attendance at a November 2020 rally in Washington, D.C. he referred to “100 of us Proud Boys.”

11. SPEED has made comments to UCE-1 indicating that he had developed an anti-government ideology.² At a meeting on March 1, 2022, SPEED stated that he had recently quit his job, noting that he had worked for the government his entire career. SPEED commented that he previously viewed himself as being a good patriot by working for the government but that he did not see it that way anymore and that he had come to believe that he was “lending [his] skillset to evil.” SPEED stated that the “last fourteen months”—which would be since January 2021—had been an “eyeopener.”

12. In conversations with UCE-1, SPEED also made comments sympathizing with domestic terrorists Eric Rudolph and Ted Kaczynski. During the meeting on March 1, 2022, SPEED noted that he was reading the book by the “guy who bombed the Olympics in the 90s.” The following day, SPEED sent UCE-1 an SMS message of an Eric Rudolph book as the one discussed during the meeting. Eric Rudolph planted a backpack containing a bomb in a crowded Centennial Olympic Park in Atlanta, Georgia, in July 1996, killing one person and injuring more than a hundred of others. Rudolph subsequently bombed additional locations, resulting in other injuries and the death of a police officer.

13. At the meeting on March 1, 2022, SPEED stated that he thought what Rudolph did was a mistake and that the bombing did not accomplish anything. But SPEED noted that

² In discussions with UCE-1, SPEED has also made comments indicating an interest in running for political office.

Rudolph “was a right winger that got tired of what was happening and he wrote a book over his several year[s] running from the FBI.” SPEED said that he “thought that was cool and . . . love[d] the fact that [Rudolph] can say what he did because he ha[d] nothing to lose by writing [the book].” SPEED noted that he was “trying to find more books like that because [he] love[d] reading about people that are like ok, yeah, you’re assassinating bad guys, that’s cool, but if it’s approved then you’re always killing the small fry, you’re never actually going after the people who actually . . . ,” and then trailing off.

14. During the same meeting, SPEED also stated that he “like[d] to read more stuff like that, like Ted Kaczynski,” who is commonly known as the “Unabomber.” SPEED stated the following (with my emphasis added):

Kaczynski wrote a manifesto and once again, like the stuff he did was not effective, but I can commiserate with where he was coming from. Because I think as people who can see their country fall deeper and deeper into wherever we’re going, we all know we have to do something so it’s useful to see what worked and what didn’t work. ***So, it’s useful to get into these people’s heads and you know, try and come up with a better game plan than they had.***

15. During a meeting with UCE-1 on March 15, 2022, SPEED discussed Eric Rudolph again. In doing so, SPEED suggested Rudolph went wrong because he targeted rich people, when it is not about the money. SPEED said that instead it is “about power.”

16. During the same March 15 meeting, SPEED made comments approving the use of violence over nonviolence. For example, SPEED discussed a “historical video” that he watched “about the Scythians from the 500s AD.” SPEED noted that they were an “amazing culture, where nobody would mess with them.” He described how the Scythians “actually enjoyed having regular wars because they felt like that was good for their moral, it was good for their masculinity.” SPEED stated that the Scythians “are sort of the progenors [sic] of what we now call the Aryan race.” SPEED then stated the following (with my emphasis added):

[The Scythians are] our legacy, they're the people—and I can see why I was never taught about the Scythians in school because, man, as a boy if I'd known stuff like that--you think about it, the fact that, all growing up and--the, you probably have the similar—all growing up, all I was taught was, oh peace above all cost, non-violence is the most amazing thing ever. Don't stick up for yourself. Be-be the peacemaker, and even with all that, what did I want to do when I grew up? *I wanted to join the military and go shoot guns and kill people. It's innate. Imagine how much more could have been accomplished if I hadn't been steered away from that my entire life.*

17. In his meetings with UCE-1, SPEED has also manifested an anti-Semitic ideology, which appears to inform his anti-government ideology. For example, during a meeting with UCE-1 on April 7, 2022, SPEED made a number of remarks related to his anti-Semitic ideology. In discussing his view of current American politics, SPEED lamented that he previously “didn’t realize . . . how organized the opposition is” and “what [he] didn’t realize is the whole Jewish element,” which he described as a “total blind spot.” SPEED stated, “And so now that I see that, I feel like . . . if we don’t have an organized way to fight back there’s absolutely nowhere to commit.” SPEED noted that “Hitler really demonstrated that.”

18. SPEED made additional anti-Semitic statements during the April 7 meeting. As a further example, when discussing the war in Ukraine, SPEED stated that he “would love to see [Putin] just really be the leader that the world needs right now” but that he does not “know if he will be” because “he has a lot of Jews around him who advise him.” In another part of the conversation, when justifying the Nazis’ actions during *Kristallnacht*, SPEED stated as an aside that “Jews, for some reason love gang raping people. It doesn’t matter what they’re doing, they always have time to gang rape . . . white girls.” And SPEED made comments discussing his admiration for Adolf Hitler, describing Hitler as “one of the best people that’s ever been on this earth” and stating that he “really want[s] somebody like Hitler to stand up and say, ‘We’re going to stand against this moral incineration that we’re seeing in the western world.’” I emphasize SPEED’s anti-Semitic remarks to provide the context for his violent rhetoric discussed below.

19. During the meeting on April 7, 2022, after SPEED criticized the Black Lives Matter movement and Antifa for being Jewish, UCE-1 asked what could be done to stand up to them. SPEED first suggested communicating in an effective manner as Hitler did, praising Hitler as being “really good at . . . really talking to the masses.”

20. SPEED described the second option as “we can go from the top. We can go for people who actually— And that’s what I was thinking when I was reading that book . . . by [Rudolph]. He was like, ‘Oh, I’m going to go for rich people.’ I think he’s wrong. Some rich people are on our side.” Instead, SPEED stated, “Go for the people who matter, like, trying to think – trying to – like go for the [Anti-Defamation League] right now. . . . Because they spend all their time pushing for laws, like, this anti-lynching law . . . that Biden just signed.” SPEED said that the anti-lynching law was being passed because “they know things are . . . going to get bad enough, that people like us are going to band together and straight up start lynching people.”

21. In the same conversation, SPEED then noted an ADL member in the area. SPEED stated, “[B]ecause we do live in the DC area, so there’s actually . . . a lot of these . . . enemies that appear because this is where the seat of government is. . . . So we have an advantage. . . . Everybody is here.” SPEED stated that he has not “fleshed this idea out but there are these people—and the thing is, it’s not like they aren’t murdering us.”

22. When UCE-1 asked where the red line was, SPEED said that the “red line should be operational, meaning don’t get caught.” Later in the conversation, when discussing people getting kicked out of the military for the vaccine, UCE-1 stated that “[m]aybe it’ll take them to go . . . operational on everything.” SPEED agreed, “Yeah. That’s what we need to do. A lot of people with combat experience.” SPEED stated that it would take “not just anybody because it takes a certain kind of person.” SPEED claimed that “we have that personality” and that it takes

“somebody that’s confident that they’re doing the right thing,” which “means they have to be educated.”

23. During this conversation, SPEED suggested that people in militias would not have what it takes to engage in violence. SPEED stated the following:

I know some people in the militia, but they haven’t taken the time . . . Like, they’re not going to be the ones to do it just because they’ll never be able to convince themselves, “Look, you know . . .” They’ll talk about it. . . . I think they don’t know themselves well enough. When that time comes and they’re actually—they’re looking at somebody in their sights that’s coming down their dirt road to their house to take their guns . . . and their children, they got them in their sights and they’re about to pull the trigger, they’re not going to pull the trigger because they’re Christians, and they’ve been taught. . . . Christian churches are teaching people to be pacifistic. Because they’ve been . . . taken over. We got to . . . overcome . . . and that’s going to take a lot of work.

24. In the same conversation, SPEED discussing trying to figure out how to identify potential targets. He stated the following:

I’m sure about certain people, and . . . I need to figure out—what—what worries me-- Is that the people I’m sure of, like George Soros. Let’s . . . say I’m . . . sure about George Soros. Well, when am I ever going to have the opportunity to like-- You know what I’m saying? What I need to be sure of is people in my neighborhood. People that are actually, uh, reachable by someone like me. People who don’t have bodyguards. People who don’t have intel organizations helping them out.

25. When UCE-1 asked if he was referring to the “ADL,” SPEED confirmed that he was and that “they’re . . . pretty high up.” SPEED then suggested using a “mock trial” to identify potential targets. He stated the following:

But . . . that’s the other thing, right? You know? Like, people that I can reach. And the farther down they are on the chain, the less sure I become, which is my deficiency. Like I recognize that. . . . I’m still working through how I figure that out. Like, I even thought, “Maybe I’ll do like a . . . mock trial just where I write down the arguments for and against . . . and come to a decision, then say, okay, now this person” . . . “I can put this person on the list and I know I’m sure.”

26. SPEED then praised the approach of jihadists and suggested that their approach would be an effective way to “wipe out” the opposition, referring to Jewish people. SPEED stated the following:

Here’s the thing, . . . I saw this years ago and I never . . . saw it in context until recently, but people always talked about how, ‘Oh, jihadists are so dumb. They don’t realize that no matter what they do, like, if you—if they kill themselves and take out people, like, what does that . . .’ Like, actually, it’s a very, very smart way of doing it because there are way more Muslims than there are Christians, so if each Muslim takes out three Christians, you could completely wipe out Christianity from the earth, and most Muslims would still be around then. Uh, just doing the numbers, it works really well. Which is why they keep doing it, and it’s very effective. We need to look at it that way, too. We need to say, ‘Look . . .’ I mean, two percent of the population is Jewish. . . . Now, what if, uh, three percent takes action here, it’s us three percent against two percent. . . . Like, that’s the numbers where we can literally win just on the numbers. Right? So if we took out—if we take out even one, we’ve done more than we need to take out. Like, if—if that were to happen, we could just literally take out just one person, one to one, and we’re immediately arrested or killed or jailed or whatever we would manage to leave one percent of true fighters. We’d wipe out the opposition and leave the entire country free to finally live through that. . . . But what I’m saying is, as soon as we—as soon as we pull our trigger against the fucking person, you will succeed, we’d be done. You have—you have done more than your fair share. And that’s a victory. Whatever happens after that is icing on the cake. And so, that . . . numbers game, like, just take out one here, one there, you know? Maybe every few months, you know? It doesn’t necessarily have to be a full-time thing. It’s like, but we’re doing something that’s going to have a big impact.

27. In this conversation, SPEED continued by describing how kidnappings would be more effective than killing people. SPEED stated the following:

[K]idnappings are harder than killing people but they’re more effective. What I would love to see is you take somebody out, and they simply disappear. Nobody knows what happened to them. That means we can’t report on it, the media doesn’t know how to spin it. . . . And all of those people who were left behind have . . . no way to close that bridge, no way to know if they’re in danger. . . . We need to foster distrust within the opposite side, just like they do for us. . . . If you leave nothing behind, they never find the body.

28. I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 21, 2022



Christon Turner
Special Agent
Federal Bureau of Investigation