

## Exhibit 1

I make this affidavit in support of an arrest warrants for the following individuals: Luke Austin LANE, date of birth (DOB): 08/27/1998, Social Security Number (SSN) [REDACTED].

There is probable cause to believe that LANE, KADERLI and HELTERBRAND conspired to murder VICTIM 1 and VICTIM 2, a married couple in Bartow County, Georgia.

This affidavit is based upon my knowledge of the investigation and upon information received from other law enforcement officers who are familiar with the investigation. Because this affidavit is offered only to support the issuance of an arrest warrant, it does not contain all the information learned during the investigation.

### ***Background on "The Base"***

LANE, KADERLI, and HELTERBRAND are members of a white racially motivated violent extremist group known as "The Base," which seeks to accelerate the downfall of the United States (US) government, incite a race war, and establish a white ethno-state. Members of The Base recruit new followers and communicate through a variety of online platforms and encrypted online messaging applications and chat rooms. Within The Base's encrypted chat rooms, LANE, KADERLI, HELTERBRAND, and other members of The Base, both known and unknown, have discussed, among other things: recruitment; the creation of a white ethno-state; committing acts of violence against minority communities (including African-Americans and Jewish-Americans) and other groups with rival ideologies such as Antifa; and planning and participation in The Base's paramilitary training camps.

### ***Leadership, Structure and Ideology of The Base***

The Base was founded in or around July 2018 for the purpose of uniting white nationalists to prepare for a violent insurgency against various targets, including the United States government and non-white minority groups. Using encrypted online chat rooms, leadership of The Base has encouraged its members to meet in person and engage in military training in order to prepare for the insurgency.

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Base members frequently utilize encrypted messaging applications to discuss Base matters across the nation and the globe. Using an encrypted online messaging application, Base members discuss topics including how to evade law enforcement, and what would happen if law enforcement tried to disrupt their activities. The Base members have also discussed whether the “Government is actively working to get warrants” for The Base and whether or not “they’d be able to use RICO<sup>1</sup> on us.” Members have also discussed how they would react if law enforcement showed up with warrants, including reactions such as shooting at law enforcement; suicide by cop; and the importance of not letting law enforcement take them alive if they come with a warrant. Other topics have included support for the perpetrator of a 2018 mass shooting at a synagogue in Pittsburgh, Pennsylvania, and other methods to escalate white supremacist violence.

Leadership of The Base has cautioned its members, “in this current phase to be as covert as possible,” and continued, “for now we need non-attributable actions but that will still send a message and/or add to acceleration as much as possible.” Leadership has also encouraged Base members to hold “meet-ups,” or in-person meetings, and offered unknown prizes to the “region with the most IRL<sup>2</sup> activity each month.” Photographic and video evidence proving the existence of these activities is often posted online.

For approximately the last two years, leadership and members of The Base have also used online social networks to promote terrorism, lone-wolf attacks, and the idea of a white ethno-state. Examples of those posts include:

- A. “No need to wait until all conditions for revolution exist – guerilla insurrection can create them. Insurgency begins as a terrorist campaign.” This post was accompanied by a photograph of an explosion and an individual carrying what appeared to be an assault

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<sup>1</sup> I believe this to be a reference to the Racketeer Influenced and Corrupt Organizations (RICO) federal law.

<sup>2</sup> Based on my training and experience, I believe “IRL” is slang for “in real life.”

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rifle watching the explosion. Based on my training and experience, I believe leadership of The Base was encouraging members to incite acts of terrorism.

- B. "If you want a society with traditional values, electoral politics could still achieve that theoretically. But if you want a \*White\* society, electoral politics can't achieve that unless the current System of government is replaced. The current System can't be replaced peacefully." Based on my training and experience, I believe leadership of The Base was encouraging violent action in furtherance of a white ethno-state.
- C. Start your 3-man Trouble Trio cell ASAP – it may seem like an ineffectual token gesture, but large numbers of simple individual cells help to establish communities of resistance [and] a culture of resistance which can gradually give rise to more complex [and] more effective resistance orgs."
- D. "[E]ssentially operate like a glorified street gang thinking in terms of turf, vandalism, reprisals [and] extortion of enemies until demands are met – all while avoiding civilian casualties.... Pound-for-pound basis, incendiaries can do more damage than explosives against many type[s] of targets if properly used. Most arson fires are started with a simple firebomb – plastic jug filled with gasoline lit by birthday candle attached to the handle – or electrically timed firebomb."

The Base is organized into regional chapters so that operational security would be ideal, and information would be less likely to be leaked. The Base cells have a significant degree of autonomy regarding their activities, and criminal conduct is typically not centrally coordinated in order to foster "plausible deniability" among those not directly involved.

Additionally, leadership of The Base has advised and encouraged its members about a variety of topics such as operational security, the need for compartmentalization, and the most secure methods of

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communicating with each other, to include the use of cypher codes, following the November 2019 arrest of a former member of The Base known to the group as "Landser" aka RICHARD TOBIN by the FBI in New Jersey.

On or about December 12, 2019, the leader of The Base communicated the following in discussion of those topics with members of The Base, including LANE, via the group's private encrypted online messaging application chat:

"Also keep in mind that with the exception of Landser, most guys are getting busted based on a human source not based upon the technology."

"You can have the most secure app imaginable but if there's an infiltrator, you're done."

"Obvious I [sic] know but that's why I personally think the goal shouldn't be to eliminate eavesdropping 100% (impossible) but to implement a comms method that will more easily allow to identify where the eavesdropping/leak is originating from."

"...When infiltration does happen I mean."

"So that way you can at least contain it quickly and implement a degree of damage control."

"Compartmentalization is the most straightforward method, and is as effective as it is simple."

"On top of that would be cyphers, as we've discussed."

"More effective than cyphers is face to face when/where feasible."

I think a combo of compartmentalization and cyphers or face to face, the ability to identify infiltration is increased exponentially if not guaranteed."

LANE: "That and finding people with loose lips"

"That's honestly even debatably more of a threat than anything for us as of now"

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THE LEADER of THE BASE: "Yeah absolutely"

"Tight OPSEC is step one...Without that compartmentalization can't even work"

### ***FBI Undercover Operation***

On July 19, 2019, while acting in an undercover capacity, an FBI Agent Undercover Employee ("UCE") participated in an online vetting interview for admission into The Base via an encrypted online messaging application. An encrypted online messaging application user communicating under the moniker "TMB," and another Base leader, conducted the vetting interview of the UCE. After completing the interview and vetting process, the UCE was permitted to join The Base's members-only encrypted online messaging application chat room. The UCE then began to develop relationships with several members of the Base via an encrypted online messaging application.

On or about July 24, 2019, "TMB" communicated with the UCE and invited him/her to a meeting with members of the group near Rome, Georgia during the weekend of August 2, 2019. UCE agreed to attend the meeting.

On August 2, 2019, members of FBI Atlanta's Rome Resident Agency (RA) and Special Agents from the FBI Atlanta Field Office's Domestic Terrorism Squad observed the UCE meet with "TMB" and a fellow member of The Base who went by the moniker "Pestilence," in downtown Rome, Georgia. "TMB" was later identified by the UCE as Silver Creek, Georgia resident LANE, and "Pestilence" was later identified by the UCE as Dacula, Georgia resident KADERLI. According to the UCE, upon their initial meeting, LANE and KADERLI searched the UCE for any transmitters or electronic recording devices with a radio frequency (RF) detection meter prior to engaging in any discussions. After completing their search, LANE and KADERLI advised the UCE to follow them in KADERLI's vehicle to LANE's residence in nearby Silver Creek, Georgia. LANE explained to the UCE that the residence was on a one hundred and five (105) acre lot that is owned by LANE and his father.

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At the residence, LANE, KADERLI and the UCE discussed their philosophical, religious and white supremacist ideology. LANE gave the UCE a black Balaklava hood and a Velcro Base logo patch to welcome the UCE as a new member of The Base. KADERLI and LANE mentioned their Base contacts located in a variety of locations such as Washington State and the United Kingdom. LANE and KADERLI told the UCE that they would conduct firearms training the next day, to include "retreating under fire" drills and moving-and-shooting drills. KADERLI and LANE also told the UCE that other Base members were driving through the night to attend the training the next day.

The next day, August 3, 2019, the UCE arrived back at LANE's residence and was introduced to two other members of The Base. LANE and KADERLI led the UCE, and the other Base members in several shooting drills throughout the day. Based upon previous discussions with members of The Base online, the UCE believed the intended purpose of those drills were to prepare for the "Boogaloo," a term used by members of The Base to describe the collapse of the United States and subsequent race war. At the end of the training, all the Base members and the UCE posed for photographs while wearing tactical gear and Balaklava hoods. The photographs were later used for propaganda in support of The Base.

### ***Conspiracy to Commit Murder of members of Antifa later identified as Victim 1 and Victim 2***

On or about October 5, 2019, the UCE participated in another meeting with KADERLI, LANE, and another member of The Base (TB member) who crossed into the United States illegally. The meeting occurred at LANE's residence in Silver Creek, Georgia. During this meeting, which stretched into the early morning hours of October 6<sup>th</sup>, the TB member, KADERLI and LANE discussed The Base's violent opposition to members of Antifa, their desire to fight, and ultimately a veiled plan to murder an unspecified victim or victims in the presence of the UCE.

TB member engaged in the following discussion with KADERLI and LANE about Antifa:

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TB MEMBER: "These Antifa types, all these people. There has to start being consequences for what they are and that's race traitors and agents of the system."

The TB MEMBER continued: "You know, if you really want to fight these evil, evil Nazis you better be prepared for when they actually start becoming what you..."

KADERLI: "What you've vilified them to be."

TB MEMBER: "Yeah."

KADERLI: "You call them neo-Nazi terrorist enough; they'll eventually show you what a neo-Nazi terrorist is."

TB MEMBER: "Makes me wonder if they're ever really prepared for that day to come?"

LANE: "Absolutely not."

The TB member further characterized the journalist who doxxed<sup>3</sup> him as "essentially Antifa" and others like him as the enemies of The Base stating, "[A]ny engagement in anti-fascist activity will carry the death penalty."

Additionally, during the same meeting, the TB member chided KADERLI's desire to engage in violent "escapism" outside of The Base when KADERLI said he wanted to join the French Foreign Legion. The TB member told KADERLI, LANE, and the UCE that the fight they were looking for was here and advised KADERLI of a plan he and LANE had discussed undertaking. The following is a summary of that discussion:

TB MEMBER: "[E]ngaging in the escapism, let's be honest, that's kind of what has gotten us to this point."

KADERLI: "I wanna fuckin' fight something, dude. I'm so tired"

LANE: "We'll get the body dropping shit done."

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<sup>3</sup> Search for and publish private or identifying information about (a particular individual) on the Internet, typically with malicious intent.

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TB MEMBER: "You're gonna be about two months away from fighting something, I'll tell you right now."

KADERLI: "Two months? I don't know if I'm prepared for two months."

TB MEMBER: "Actually, I'll put it this way. If we didn't have a certain kind of situation there would have been some opportunities a couple week [sic] ago."

LANE: "Yeah. Here."

TB MEMBER: "And I'm not understating that. We literally were planning and racking our heads as to how to do it, but the risk level is just too fucking high [pause] to do the jobs, too risky."

LANE: "Yeah, I mean it's not necessarily us being pussies, it would be more so us being incompetent by doing it too early."

KADERLI: "Martyrdom, if you're going to martyr then it's not for an Antifa fucking faggot."

The TB member discussed their need to have the right kind of equipment for their future attack and suggested they would need "snub noses" for "sneaking in and assassination type things." The TB member did not specify who or what their intended target(s) were.

Between October 31 and November 3, 2019, the UCE participated in another meeting of The Base hosted by LANE at his residence in Silver Creek, Georgia. About a dozen members of The Base, both known and unknown, participated in the event, including KADERLI, HELTERBRAND, and the TB member.

Following the departure of the rest of the attendees, the UCE asked LANE if he would be willing to provide additional details about the plan discussed on October 6<sup>th</sup> with the TB member. KADERLI was also present for this discussion.

After placing their cellular phones in airplane mode, LANE told the UCE limited details about the plan he and the TB member had first mentioned back on October 6<sup>th</sup>. LANE did not specify the names of their intended targets but would say they were members of Antifa who lived nearby. LANE said he



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decided against carrying out the plan with the TB member because he felt the TB member was incompetent and believed they would get caught.

On or about December 2, 2019, LANE communicated via an encrypted online messaging application with KADERLI, HELTERBRAND and the UCE regarding a planned activity scheduled for Friday, December 13, 2019. Prior to these chats, LANE had characterized the activity as a camping trip during which the participants would be up all-night making friends. During the encrypted online messaging application chats, LANE instructed KADERLI, HELTERBRAND and the UCE to bring two sets of clothing that would be difficult to attribute to the subjects. LANE also instructed them to bring leather gloves or something similar they would not sweat through, as well as firearms and ammunition that had not been previously opened or handled.

The UCE subsequently spoke directly with LANE via an encrypted online messaging application on two occasions in order to elicit more information about the nature of the planned activity. During the second call on December 5, 2019, LANE told the UCE that weapons would be involved in the operation. LANE agreed to meet with the UCE at LANE's property the next day to discuss the plan in further detail.

On December 6, 2019, the UCE drove to LANE's residence. LANE and the UCE put their cell phones in a cooler, and then LANE told the UCE his plan was to kill two high-ranking Antifa members who reside in Bartow County, Georgia. Lane provided the names of a married couple to the UCE as VICTIM 1 and VICTIM 2 as well as the address of their residence in Bartow County, Georgia. LANE told the UCE that he received this information about VICTIM 1 and VICTIM 2 from KADERLI.

LANE told the UCE he chose the targets because of their affiliation with a group called the Atlanta Antifascists and because they had no known connection to The Base. LANE believed killing the couple would ultimately send the right message and show that the previous actions undertaken by antifascists like VICTIM 1 and VICTIM 2, such as doxing white supremacists, would not continue to go unpunished.

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LANE told the UCE he intended to tell KADERLI and HELTERBRAND the full details of his plan after they arrived on LANE's property on December 13, 2019. After informing them of the plan, LANE believed KADERLI, HELTERBRAND, and the UCE would then go out and commit the murders.

LANE told the UCE that he (LANE) believed both KADERLI and HELTERBRAND would be "solid" and participate in his plan. LANE felt confident of KADERLI and HELTERBRAND's commitment based on previous discussions with KADERLI about his interest in getting involved in "stuff like that," as well as from discussions LANE had with HELTERBRAND when he (HELTERBRAND) initially joined The Base. During those discussions with HELTERBRAND, LANE told the UCE he made it clear to HELTERBRAND that the purpose of The Base was to kill people.

During his conversation with the UCE, LANE became convinced that murder of VICTIM 1 and VICTIM 2 was not sufficiently planned. LANE advised the UCE that LANE, KADERLI, HELTERBRAND and the UCE should still meet on December 13, 2019, but that meeting was now to make sure everyone agreed to participate and to further plan operational security related to their plans. LANE said he wanted the UCE to be involved due to UCE's experience.

On December 13, 2019, the UCE met with LANE, KADERLI and another member of The Base at LANE's property. This other subject is not a co-conspirator to the subject crimes, and there was no substantive discussion of said crimes in his presence. However, the UCE, LANE and KADERLI did speak about the crime for a period when the other subject could not hear their discussion. In this discussion, the UCE spoke with LANE alone before KADERLI joined them. LANE stressed that HELTERBRAND was going to be involved in the murder but had a bad back and would not be available until at least February; therefore, LANE wanted to wait until then to kill VICTIM 1 and VICTIM 2. In discussing his belief that HELTERBRAND would be involved in the crime, LANE told the UCE that HELTERBRAND told LANE that he (HELTERBRAND) was "big into the Bowl Patrol stuff, you know, Dylann Roof." Dylann Roof killed nine people in June of 2015 after conducting a shooting at a church in Charleston, South Carolina.

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"Bowl Patrol" was a reference to a group of Roof's supporters, who call themselves "Bowl Patrol" as a reference to Roof's now infamous "bowl" style haircut. LANE told the UCE that HELTERBRAND also told LANE to let him (HELTERBRAND) know "when it's time to go to church." Additionally, LANE told the UCE that LANE had previously openly discussed with HELTERBRAND the fact that "this organization is going to be involved in whacking people." I further believe HELTERBRAND's statement to LANE indicated HELTERBRAND was willing to engage in acts of violence, to include murder.

LANE also told the UCE he was forming his own "side organization" to engage in these crimes. LANE said he previously discussed the nature of the "side organization" with HELTERBRAND, and stated that its sole purpose was to be involved in "whackin' people." Although LANE had thought of several names for this group, he did not believe the name was as important as the actions they would undertake.

Investigation of The Base indicates that the various cells have a significant degree of autonomy regarding their activities, and criminal conduct is typically not centrally coordinated in order to foster plausible deniability among those not directly involved. Leadership of The Base has previously expressed a desire that whatever criminal activity members chose to engage in be done covertly and in a fashion not attributable to the larger group. However, the members of LANE's cell or so-called "side organization", by whatever name, are all members of The Base.

LANE further advised the UCE that he also wanted to kill a member of The Base in Maryland and TB member because LANE had talked with TB member about killing VICTIM 1 and VICTIM 2 while TB member stayed with LANE at LANE's property for several months earlier this year. If VICTIM 1 and VICTIM 2 were killed, LANE was concerned that TB member would know LANE was involved and that TB member would share this information with others. LANE believed TB member may have already told a member of The Base in Maryland. LANE expressed this situation would cause problems for LANE and his Georgia based group.

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After discussing killing TB member and a member of The Base in Maryland, KADERLI joined the conversation and LANE advised KADERLI that LANE wanted to discuss "whacking" someone. KADERLI asked if LANE was referring to the "Cartersville guy," and LANE responded affirmatively. KADERLI responded by saying, "Alright, when is that happening?" They agreed they needed to plan the event in more detail, which included all three driving to the VICTIMS residence in order to help plan the murder. The UCE agreed to pick up LANE and KADERLI the next morning and take them there. The UCE left LANE's property, and KADERLI spent the night there.

The UCE picked up LANE and KADERLI from LANE's property on the morning of December 14, 2019 and drove them to the VICTIMS residence in Bartow County, Georgia. For this trip, the UCE placed Florida tags on his/her vehicle to demonstrate the UCE's operational security and prevent the vehicle being traced back to the UCE. While the UCE drove, LANE and KADERLI advised the UCE they (LANE and KADERLI) had continued to talk about the crime after the UCE left the day before. Agents conducted physical surveillance of the UCE, KADERLI and LANE as they drove down a residential street toward the VICTIMS residence.

After driving by and observing the physical layout of the VICTIMS property and surrounding neighborhood, LANE advised that the UCE should just drive them to the front of the house, and LANE and KADERLI would try to make entrance by using a "lock pick gun." If that did not work quickly enough, LANE would use a sledgehammer to breach the door. LANE advised HELTERBRAND would have an AR-style rifle and stand guard on the front porch while LANE and KADERLI would enter the house and kill VICTIM 1 and VICTIM 2 with revolvers. LANE and KADERLI had previously participated in discussions about killing people with revolvers because they do not leave shell casings at the crime scene. The UCE asked about the potential use of assault rifles and the fact that they automatically eject fired shell casings. LANE instructed the UCE to buy "brass bags" out of state and, if anyone asked why the UCE wanted to buy them, to say the UCE needed to retain brass for reloading purposes. LANE also instructed

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the UCE to obtain a rental car and vehicle plates from a different state than Florida, preferably from a state far away from Georgia, to use on the night of the murders.

LANE advised he wanted the group to not use clothes, boots or skull masks for the murders because those items could be identifiable to The Base. LANE also discussed renting a room from a cheap motel because the staff at such a motel would not ask any questions. They would then shower in the room to remove any dead skin. LANE said they should use long leather gloves so they could tuck their shirtsleeves into them and then tape the gloves to the sleeves. LANE also said they should use boots instead of sneakers so pants could be tucked into boots and taped to prevent dead skin from falling out during the crime. LANE suggested they also use Vaseline on their eyebrows and eyelashes to prevent leaving any evidence. After they were finished with the murders, KADERLI said the group should burn the victims' house down.

LANE reiterated that HELTERBRAND was to be part of the murders and agreed that they needed to meet with HELTERBRAND to ensure HELTERBRAND agreed with the plans to commit the murders and to further discuss the plans.

At the conclusion of the group's meeting on of December 14, 2019, LANE provided a piece of paper containing a cypher code to the UCE. LANE told the UCE that the cypher code would be used for the purpose of LANE, KADERLI, HELTERBRAND and the UCE covertly discuss details and planning of the murders of VICTIM 1 and VICTIM 2, and all future operational plans.

On December 16, 2019, the UCE communicated with LANE and HELTERBRAND and they agreed to meet at LANE's residence on the evening of December 19, 2019, to discuss LANE's plan.

On December 19, 2019, the UCE met with LANE and HELTERBRAND at LANE's residence to discuss LANE's plan in person. During their meeting, LANE advised HELTERBRAND of his intentions to murder two members of Antifa in Bartow County, Georgia. LANE told HELTERBRAND that he, KADERLI, and the

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UCE had already, "scoped them out," and discussed the reconnaissance the three had performed on the couple's residence on December 14, 2019.

HELTERBRAND asked LANE for details about the couple and their home including whether they had a security system in place; if they were "kikes;" or if LANE and the UCE thought they had any children who might live there. LANE said if the couple did have children that they would, "probably just leave them." HELTERBRAND responded, "I mean I've got no problem killing a commie kid." LANE replied, "that would depend on how everyone else feels."

As he discussed his plan LANE told HELTERBRAND, "We'd have you guys watch out, because they have a real nice front window there looking out onto the street...me and you (indicating the UCE) are probably being the ones doing the main thing, because I don't want two newbies to be freezing up while we're clearing it." LANE also discussed his intentions for the group to tape their pants into their shoes and their sleeves into their gloves as part of their "uniform", and to get a motel room where they could clean themselves up.

HELTERBRAND discussed the necessity to conduct the murders quietly and noted how loud an "AR" would be if they decided to use one. To thwart further detection, HELTERBRAND said he had "solvent traps" they could use to be more discreet and muffle the sound of the gunfire. Helterbrand also advised he had a brass bag that they could attach to their ARs and would provide more information to the UCE about the specific brand at a later date. Helterbrand believed the brass bag he owned could collect approximately 100 spent shell casings.

LANE stated they would go in with ARs "just in case," and "tell them to get the fuck on the ground, I'll take a pistol out and pop 'em." The UCE asked about KADERLI's role, and LANE responded that KADERLI would burn the victims' house down by "dumping gas all over the place, that way it makes it as fast as possible."

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HELTERBRAND expressed his willingness to contribute financially to LANE's plan and said he would start to save money out of each of his paychecks.

HELTERBRAND believed it would be difficult for authorities to trace the weapons the group used for the murders due to the, "ballistics of a mass-produced gun" and agreed to work on locating "uppers," to further disguise their weapons.

LANE reiterated the need to kill a member of The Base in Maryland and TB member because they knew about his plan to kill VICTIM 1 and VICTIM 2 in Bartow County, Georgia, were stupid, and would likely talk about it.

HELTERBRAND believed it would be difficult for authorities to tie him to the murders because he was, "good to go in the real world" and had "quote-unquote ties to the community."

HELTERBRAND offered to find or steal some license plates for whatever vehicle they would use to travel to the couple's residence in Bartow County, Georgia. HELTERBRAND also offered to bring "Adderall," "to help keep people up." and would be willing to "smoke some meth and go clear the house." LANE laughed at HELTERBRAND's offer and said, "That's race war ready."

Throughout the discussion of LANE's plan, HELTERBRAND expressed an eagerness to participate, telling LANE and the UCE, "I figured this conversation was coming. I'm excited." Additionally, HELTERBRAND stated, "it's about time" and that, "[T]his is what I've been fantasizing about for about two years now."

LANE discussed getting the entire group together for another meeting before conducting the murders, "maybe next month." HELTERBRAND advised he would need approximately six weeks to recover from his upcoming back surgery scheduled on December 27, 2019.

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At the conclusion of their meeting, LANE asked HELTERBRAND to write down a cypher code on a piece of notebook paper. The UCE believed the code LANE provided was the same one LANE gave the UCE on December 13, 2019 for coded discussions about all future plans.

On or about December 20, 2019, the UCE contacted HELTERBRAND via direct message on an encrypted online messaging application about the specific brand of brass bag HELTERBRAND mentioned during their December 19, 2019 meeting at LANE's residence. HELTERBRAND advised the UCE that he found some brass bags on sale and would purchase enough for the UCE, LANE, and KADERLI to use.

On or about January 1, 2020, LANE contacted the UCE, HELTERBRAND, and KADERLI in a private encrypted online messaging application chat LANE set-up entitled "Woods Walk Woods Talk" to communicate about the murder of VICTIM 1 and VICTIM 2. During the communication, LANE advised the group of the following:

LANE: "37C on FEB 22<sup>nd</sup> 4pm-FEB 23<sup>rd</sup> 12pm, 32W on FEB9th if we can all get that matched up let me know if theirs [sic] anything that needs to be rescheduled"

"33W can be at whatever time works best, I'm thinking 4pm"

"\*32W"

"Also, another note for the 32W, bring your code sheets"

"And Helter you can also bring the logins if your system is ready to go"

"59B for both of those btw"

HELTERBRAND: "Those dates look good on my end"



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According to the cypher codes LANE provided the UCE on December 14, 2019, "37C" was the code for murder, also known to the group as their "camping trip", "32W" was the code for planning the murder, and "59B" was the code to meet at LANE's residence in Silver Creek, Georgia.

On or about January 7, 2020, the UCE contacted LANE, HELTERBRAND, and KADERLI in a private Encrypted online messaging application chat and asked if the group would be willing to meet earlier than February 9, 2020 to discuss their plans to murder VICTIM 1 and VICTIM 2 at their home in Bartow County, Georgia. LANE and HELTERBRAND agreed to reschedule the meeting for January 12, 2020 at LANE's residence in Silver Creek, Georgia. Additionally, the UCE asked HELTERBRAND, through coded language, if he would be willing to bring the brass bags they discussed previously. HELTERBRAND responded affirmatively and told the UCE he would bring them.

On January 12, 2020, the UCE met LANE and HELTERBRAND at LANE's house at about 8:35pm. Shortly after arriving they all secured their phones at LANE's house and departed in the UCE's vehicle. They drove to the VICTIMS' residence in Bartow County, Georgia and conducted a reconnaissance of the house. They discussed each members' job assignment for the murder and details of the plan. HELTERBRAND stated he wanted to, "Pop my cherry," and be one of the members pulling the trigger and killing the VICTIMS. They discussed using a .22 caliber weapon, and that they would all be able to pull the trigger if desired. They returned to LANE's residence following the reconnaissance. LANE stated he had been doing research and found more targets in the region. LANE said they were all members of the television media. The UCE added that these murders would be a good preparation killing for any future targets.

After arriving back at LANE's on January 12, 2020, HELTERBRAND produced the brass catching bags he purchased for the members to use for the murder. He demonstrated how to attach and use them on their weapons. HELTERBRAND gave the UCE one bag and LANE two, one for KADERLI. HELTERBRAND

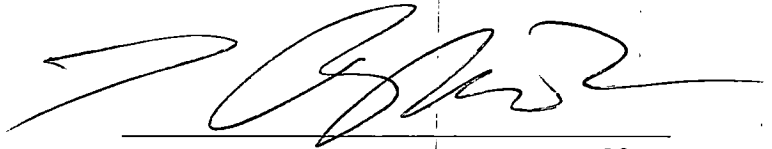
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also brought his homemade solvent trap suppressor, showed it to LANE and the UCE, explained how to make it, and gave it to LANE. HELTERBRAND also said he was working on a personal server for the group so they would have secure communications once it is complete.

AFFIANT AA

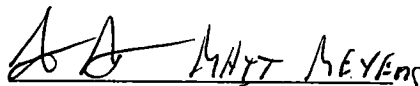
TITLE MATT MEYERS, SERGEANT  
FLOYD COUNTY P.P.

Sworn to and subscribed to before me this 14 day of January, 2020, at  
5:15 (A.M.) (P.M.)



Judge of the Superior Court J Bryant Dinkins  
Floyd County, Georgia Ja

For the protection of the witnesses and law enforcement and to protect the integrity of the ongoing investigation, Affiant respectfully request that this Affidavit be sealed until the execution of all search and arrest warrants are complete that pertain to this case. Affiant will contact the courts when all search warrants are executed.


  
MARY MEYERS  
FLOYD COUNTY S.P.  
1-14-19


Affiant Officer

  
Superior Judge J. Bryant Durham, Jr.

Sworn and subscribed this 14<sup>th</sup>, of January, 2020

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MATT MEYERS  
FLORA COUNTY P.O.  
1-14-19  
Affiant Officer

  
Superior Judge  
J. Bryant Durham, Jr.

Sworn and subscribed this 14<sup>th</sup>, of January, 2020