

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

District of South Carolina

United States of America

v.

Brandon Cory Lecroy

Case No.

8:18-mj-57

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 April 2018 in the county of Greenville in the District of South Carolina, the defendant(s) violated:

Code Section 18 USC § 1958 Offense Description Murder for hire

This criminal complaint is based on these facts:

Attached Affidavit

Continued on the attached sheet.

Complainant's signature

Brian N. Smith, Task Force Officer FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: April 10, 2018

Judge's signature

City and state: Greenville, South Carolina

Jacquelyn D. Austin, U.S. Magistrate Judge

Printed name and title

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

United States of America)

v.)

Brandon Cory Lecroy)

Case No. 8:18-57

UNDER SEAL

AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR AN ARREST WARRANT

I, Brian N. Smith, being first duly sworn, hereby depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I am currently employed as a Deputy with the Lexington County Sheriff's Department and have been so employed since May of 2008. I am currently assigned to the Domestic Terrorism (DT) Squad of the Joint Terrorism Task Force (JTTF) with the Columbia Division of the Federal Bureau of Investigations (FBI) and have been so since August of 2016 during which I have worked complex investigations concerning Weapons of Mass Destruction and individuals attempting to purchase or procure explosives. While conducting these investigations, I have frequently utilized Undercover Employees and Confidential Human Sources to gather information.
2. I have written and submitted to the Court numerous affidavits in support of Arrest Warrants and Search Warrants. I have received training, both formal and informal, in the investigation of criminal and DT matters involving Weapons of Mass Destruction and explosives. In addition, I have training and experience in obtaining evidence of illegal activity and am familiar with the facts and circumstances surrounding this investigation, both from my own investigative activities and from information obtained from law enforcement officers and others with personal knowledge of the facts.

3. This affidavit is intended to show only that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

APPLICABLE STATUTE(S)

4. Based on my training and experience, and the facts as set forth in this affidavit, there is probable cause to believe that BRANDON CORY LECROY violated the following criminal statute (among others):
 - a. 18 U.S.C. § 1958 – murder for hire.
5. In and around April 2018, in the District of South Carolina, BRANDON CORY LECROY, did use and cause another to use a facility of interstate commerce with the intent that someone be murdered in violation of the laws of South Carolina – that is, killing a person with malice aforethought – as consideration for the receipt of, and the promise and agreement to pay, anything of pecuniary value, in violation of Title 18, United States Code, Section 1958.
6. This Affidavit is submitted in support of a Complaint. I am familiar with the facts and circumstances surrounding this investigation, both from my own investigation and from information obtained from law enforcement officers and others with personal knowledge of the facts. Those facts necessary to establish probable cause are included in this Affidavit.

PROBABLE CAUSE

7. The FBI is aware that BRANDON CORY LECROY (LECROY) lives in Greenwood County, South Carolina. Based upon surveillance and other information, the FBI has learned that many of the actions listed below have occurred in Greenwood County, which is located in the Greenville Division of South Carolina.
8. On 03/19/2018, an FBI Confidential Human Source (CHS #1) reported that a resident of South Carolina named BRANDON LECROY had contacted a WSE organization. CHS #1 further

reported LECROY indicated that he wanted to seek assistance with the murder of his African American Neighbor.

9. On 03/20/2018, via a recorded telephone conversation, LECROY made an arrangement with an FBI Undercover Agent (UCE) to pay for the murder of his neighbor "FJ". During the phone call LECROY told UCE "\$500 and he's a ghost". LECROY also makes request to put a "flaming cross" in the front yard and hang his neighbor from a tree. At the time of the call, the UCE was located in Virginia and so informed LECROY.
10. On 03/20/2018, LECROY texted UCE images and names of two intended targets. One of which was his neighbor "FJ" of XXX XXXXXX XX, Hodges, SC 29653. These images appear to have been taken from an internet website.
11. On 03/22/2018, via a recorded telephone conversation, LECROY reaffirms the agreement previously made on 03/20/2018. LECROY also provides UCE with further intelligence on when to best to commit the murder as well as plans to take over the victim's property. LECROY also expresses to the UCE that he wishes to obtain a 9mm handgun with two "clips". LECROY stated that he wants a "ghost gun" that is untraceable and not stolen. LECROY also advised the UCE that he has more jobs for him in the future.
12. On 04/09/2018, LECROY met with UCE in Greenwood, SC. During this meeting, LECROY pointed out FJ's residence and discussed future targets. LECROY also provided UCE with a \$100 cash down payment with acknowledgment that this payment was for the murder of his neighbor.
13. Based on the foregoing, I believe that probable cause exists to support charges of 18 U.S.C. §1958 (murder for hire), and that the nature of these crimes, combined with other facts and

circumstances, further supports the issuance of a warrant by this court for the arrest of LECROY.

14. I further request that the Court order that this affidavit be sealed until further order of the Court.

These documents discuss an ongoing criminal investigation. Release of the information at this time would jeopardize an ongoing investigation including by giving any potential individuals with knowledge of Lecroy's actions and plans the opportunity to destroy or tamper with evidence, change patterns of behavior, intimidate potential witnesses, flee from prosecution, and endanger the safety of individuals. Accordingly, there is good cause to seal these documents.

This affidavit was reviewed by AUSA William Watkins.


Respectfully submitted,



Brian N. Smith
Task Force Officer
Federal Bureau of Investigation

Subscribed and sworn before me

On April 10, 2018



Jacquelyn D. Austin
United States Magistrate Judge