

REI 8/20/17

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States Courts  
Southern District of Texas  
FILED

AUG 20 2017

David J. Bradley, Clerk of Court

United States of America )

v. )

Andrew Cecil Schneck )

DOB: )

Case No.

H17-1354

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 August 19, 2017 in the county of Harris in the  
Southern District of Texas, the defendant(s) violated:

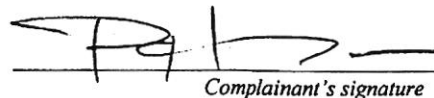
Code Section

Offense Description

18 USC 844(f)(1)

Attempt to maliciously damage property receiving Federal financial  
assistance

This criminal complaint is based on these facts:

TRUE COPY I CERTIFY  
ATTEST:  
DAVID J. BRADLEY, Clerk of Court  
By Kathleen Murphy Deputy Clerk☒ Continued on the attached sheet.  
Complainant's signature

FBI Special Agent Patrick Hutchinson

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/20/2017  
Judge's signatureCity and state: Houston, Texas

U.S. Magistrate Judge Stephen Wm. Smith

Printed name and title

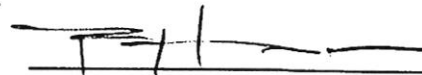
## AFFIDAVIT

I, Patrick Hutchinson (hereafter Affiant), being duly sworn, do hereby depose and state:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI) and assigned to the FBI Houston Division, Joint Terrorism Task Force which is comprised of Agents from the FBI, Officers from the Houston Police Department (HPD), and Deputies from the Harris County Sheriff's Office (HCSO), Special Agents from the United States Secret Service. I have been a Special Agent with the FBI for approximately five years. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers, other witnesses, and my own personal knowledge. Since this affidavit is made for the limited purpose of supporting a criminal complaint, I have not set forth each and every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crime charged. Unless otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.
2. Based on the facts and circumstances outlined below, there is probable cause to believe that, Andrew Cecil Earhart Schneck, white male, date of birth                      did commit the following acts: 18 United States Code Section 844(f)(1) – attempt to maliciously damage or destroy by explosive, to property owned by any organization that receives Federal financial assistance.
3. On 8/19/2017, at approximately 11:05 pm, Houston Park Ranger, Tamara Curtis (Curtis), driving on routine patrol on Cambridge Street in Houston, Texas, observed the subject, Andrew Earhart Schneck (Schneck), kneeling among the bushes in front of the General Dowling Monument located in the median strip of Hermann Park. Curtis approached Schneck and asked if he was employed by the city. Schneck did not answer until Curtis walked closer and asked Schneck to come out of the bushes. Curtis observed Schneck to be holding two small boxes with various items inside to include what appeared to be duct tape and wires.

4. Curtis asked Schenck to put the boxes on the ground while they were speaking. While placing the boxes on the ground, Schneck took a clear plastic bottle appearing to be full of a clear liquid from one of the boxes. Schenck then proceeded to drink from the bottle, then immediately spit the liquid on the ground next to him. Schenck then proceeded to pour the contents of the bottle on the ground next to him.
5. Curtis observed a timer and wires in the box and notified Houston Police Department (HPD). HPD then notified the HPD Bomb Squad.
6. When asked by Curtis if he wanted to harm the statue, Schneck responded that he did, and that he (Schneck) did not "like that guy."
7. HPD Bomb Squad arrived and assessed the box and its contents. HPD Bomb Squad then field tested the clear liquid and a white powder that was present in a small, black aluminum tube, approximately .25 inches, by 1 inch. The HPD Bomb Squad used a Gemini Thermoscientific device to test the substances. The results of the field test were sent via email for verification. The results of the tests indicate that the clear liquid was most likely nitroglycerin. The results of the white powder indicate that the substance was most likely HMTD.
8. HMTD is an acronym for Hexamethylene triperoxide diamine. HMTD is a high explosive organic compound. HMTD is used as an initiating, or primary explosive.
9. Nitroglycerin has been used as an active ingredient in the manufacture of explosives. In its pure form, nitroglycerin is a contact explosive, with physical shock causing it to explode, and it degrades over time to even more unstable forms. Nitroglycerin is highly dangerous to transport or use. In its undiluted form, it is one of the world's most powerful explosives.

10. HPD Bomb Squad assessed the following contents of the box were capable to produce a viable explosive device: timer, wires connected to a homemade detonator, battery, and HMTD.
11. While being questioned by the police, Schneck stated he had other chemicals at his home. Schneck lives with his mother, Cecily Earhart Horton, at Albans Road, Houston, TX. Cecily Earhart Horton also owns the adjacent property, Albans Road, Houston, TX.
12. On 8/20/2017, Cecily Earhart Horton stated that Schneck uses the property located at Albans Road "to conduct his [Schneck's] chemistry experiments."
13. On 8/20/2017, Cecily Earhart Horton also stated that as of 8:30 pm on the night of 8/19/2017, Schneck was in his bedroom at Albans Road, Houston, TX.
14. The City of Houston, Texas receives federal financial assistance for maintenance of Hermann Park where the General Dowling Monument was located.
15. Based upon the information delineated above, I believe that probable cause exists for the issuance of a Criminal Complaint charging Andrew Cecil Schneck with a violation of 18 U.S.C. § 844(f)(1) Attempt to maliciously damage to property receiving Federal financial assistance.



Patrick Hutchinson, Special Agent, FBI

Subscribed and sworn before me this 20<sup>th</sup> of August 2017, and I find probable cause.



Stephen Wm. Smith  
United States Magistrate Judge