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A COMPLAINT WAS	S FILED AT 2:45	_	THIS DATE AS FO	LLOWS: (W)
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INVESTIGATION; THAT				
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			ITH PEOPLE'S TE	MPLE b7C
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CEASED TO	BE A MEMBER OF T	HE PI BUI	HE MAINIAINED	1
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PAGE TWO SF 89-250 UNCLAS E F T O CONTACT WITH FAMILY MEMBERS IN THE ORGANIZATION AND KNOWS PARTICIPANTS IN THE ORGANIZATION BASED UPON HIS PERSONAL EXPERIENCE COVERING APPROXIMATELY IN DURATION. ON MOVEMBER 13, CONGRESSMAN RYAN AND WENT TO THE COMPOUND AT JONESTOWN. ON PREPARED TO LEAVE THE COMPOUND IN THE NO VEMBER 17. EARLY AFTERNOON HOURS. FROM THE JONESTOWN COMPOUND ON THE 17TH OF NOVEMBER, 1978, THE PARTY, INCLUDING CONGRESSMAN RYAN, WENT TO AN AIRPORT SITE AT FORT KAITUMA. AT THAT LOCATION THE PARTY EXPECTED TO LEAVE TO RETURN TO GEORGETOWN AND EVENTUALLY RETURN TO THE UNITED STATES. WHILE AT THE AIRPORT SITE TWO AIRPLANES WERE PRESENT IN WHICH THE PARTY OF CONGRESSMAN RYAN AND CERTAIN MEMBERS OF THE PT GROUP WHO HAD b6 b7C BEEN RESIDING AT JONESTOWN PREPARED TO BOARD THE PLANES FOR PURPOSES OF RETURNING. WHILE THE TWO PLANES WERE AT THE AIR-A TRACTOR PULLING A TRAILER OF PT INDIVIDUALS. STR IP, THE TRACTOR PILLED THE TRAILER TO THE EDGE OF THE CLEARING AT THE FAR END OF THE RUNWAY. TOLD CONGRESSMAN RYAN TO HURRY UP AS HE FELT SOMETHING SERIOUS THE INDIVIDUALS ON THE WAS ABOUT TO HAPPEN.

PAGE THREE SF89-250 UNCLAS E F T O			
TRAILER TO BE THE FOLLOWING INDIVIDUALS: BOB			
KICE, TOM KICE, JOSEPH WILSON, ALBERT TOUCHETTE, RON JAMES,			
EDDY CRENSHAW, WESLEY BRIDENBACH AND RON TALLEY.			
URG ED			
CONGRESSMAN RYAN TO HURRY UP AND LEAVE THE AREA. AMONG THE			
GROUP OF PEOPLE TO LEAVE ON THE FLIGHTS WAS LARRY LAYTON.			
THE TRAILER AND TRACTOR APPROACH WITHIN THIRTY			
FEET OF THE AIRCRAFT. AT THIS TIME ALSO THE MOTOR OF THE PLANE			
WAS RUNNING. BEGAN HEARING SHOOTING. HE IMMEDIATELY			
OBSERVED CONGRESSMAN RYAN FALL TO THE GROUND. AT THIS SAME			
TIME VARIOUS PEOPLE STARTED FALLING TO THE GROUND DUE TO THE RIFLE			
FIRE. MEMBERS OF THE GROUP ON THE TRAILER			
CARRYING ARMS. THE MEMBERS OF THE TRAILER GROUP			
APPROACHING ONGRESSMAN RYAN'S PARTY. HE OBSERVED TOM KICE			
SHOOT DON HARRIS, REPORTER FOR NBC NEWS IN THE HEAD AT POINT			
BLANK RANGE. HE ALSO OBSERVED BOB KICE, JOSEPH WILSON AND			
ALBERT TOUCHETTE SHOOTING VICTIMS IN THE HEAD. AT THE TIME THAT			
ALL THE SHOOTING GOING ON, HE HAD ESCAPED FROM THE			
PLANE AREA TO THE JUNGLE PERIMETER. DUE TO WHAT HE SAW			
FURTHER RETREATED INTO THE JUNGLE AND REMAINED THERE UNTIL			
<u>(</u> w)			

PAGE FOUR SF89-250 UNCLAS E F T O

APPROXIMATELY 9:30 AM THE NEXT DAY. HE THEN RETURNED BACK

TO THE AIRSTRIP LOCATION. WHEN HE ARRIVED AT THIS TIME, HE

SAW WHAT HE BELIEVED TO BE GUYANESE SOLIDERS CHECKING THE BODIES

AT THE AIRSTRIP. HE DECIDED TO APPROACH THE SOLIDERS AND

IDENTIFY WHO HE WAS. HE ASKED THEM FOR PROTECTION AND THEY

FURNISHED HIM PROTECTION AT THIS TIME.

IDENTIFICATION OF THE PT MEMBERS ON THE TRAILER BASED UPON HIS

PERSONAL ASSOCIATION WITH THE ORGANIZATION AND HIS KNOWLEDGE

OF THE MEMBERS OF THE GROUP. DONALD R. HALE, SPECIAL AGENT,

FEDERAL BUREAU OF INVESTIGATION. SUBSCRIBED AND SWORN TO BEFORE

ME THIS 24 DAY OF NOVEMBER, 1978, FREDERICK J. WOELFLEN, UNITED

STATES MAGISTRATE.

IINITED STATES DISTRICT COURT

FOR THE

NORTHERN DISTRICT OF CALIFORNIA

MAG ISTRATES DOCKET NO. 3-78

CASE NO. 2135 MF

UNITED STATE OF AMERICA

COMPLAINT FOR VIOLATION OF

V

BOB KICE; TOM KICE; JOE WILSON; U.S.C. TITLE 18

W)

PAGE FIVE SF89-250 UNCLAS E F T O EFTO

ALBERT TOUCHETTE; RON JAMES; SECTION 351 (A) (D)-ONSPIRACY TO

EDDY CRENSHAW; RON TALLY; OMMIT MURDER AND MURDER OF A

WESLEY BRIDENBACH CONGRESSMAN

BEFORE FREDERICK J. WOELFLEN (MAGISTRATE), SAN FRANCISCO,

CAL IFORNIA (ADDRESS OF MAGISTRATE).

THE UNDERSIGNED COMPLAINANT BEING DULY SWORN STATES: ()

THAT ON OR ABOUT MOVEMBER 17, 1978 AT JONESTOWN, GUYANA AND

PORT KAITUMA, GUANA, (1) BOB KICE; TOM KICE; JOE WILSON; ALBERT

TOUCHETTE; RON JAMES; EDDY CRENSHAW; TON TALLY; WESLEY

BRIDENBACH: COUNT I: ON THE 17TH DAY OF NOVEMBER, 1978, IN

JONESTOWN, GUYANA AND PORT KAITUMA GUYANA DEFENDANTS BOB KICE;

TOM KICE; JOE WILSON; ALBERT TOUCHETTE; RON JAMES; EDDY

CRENSHAW; RON TALLY; WESLEY BRIDENBACH, WILLFULLY AND KNOWINGLY

DID COMBINE, CONSPIRE, CONFEDERATE AND AGREE TOGETHER, WITH

EACH OTHER, AND WITH DIVERSE OTHER UNKNOWN PERSONS TO KILL, LEO

RYAN, A CONGRESSMAN OF THE UNITED STATES, IN VIOLATION OF

IN FURTHERANCE OF THE CONSPIRACY AND TO EFFECT ITS OBJECT THEREOF, DEFENDANTS BOB KICE; TOM KICE; JOE WILSON; ALBERT



PAGE SIX SF89-250 UNCLAS EFTO

TOUCHETTE; RON JAMES; EDDY CRENSHAW; RON TALLY; WESLEY

BRIDENBACH; PERFORMED THE FOLLOWING OVERT ACTS: (W)

1. ON OR ABOUT NOVEMBER 17, 1978, IN PORT KAITUMA, GUYANA, THE DEFENDANTS DROVE IN AN TRACTOR-TRAILER TO THE AIRSTRIP OF PORT KAITUMA. (W)

COUNT II: ON OR ABOUT THE 17TH DAY OF NO VEMBER, 1978, IN
PORT KAITUMA, GUYANA, DEFENDANTS BOB KICE; TOM KICE; JOE WILSON;
ALBERT TOUCHETTE; RON JAMES; EDDY CRENSHAW; RON TALLY; WESLEY
BRIDENBACH, WITH MALICE AFORETHOUGHT AND WITH PREMEDITATION,
DID SHOOT LEO RYAN, A CONGRESSMAN OF THE UNITED STATES, WITH A
FIREARM, THEREBY CAUSING INJURIES FROM WHICH LEO RYAN DID DIE. W.

ALL PAPERS REGARDING THIS WARRANT WERE SEALED AND NO PUBLICITY GIVLEN. FBIHQ SHOULD CONSIER ADVISING ALL OFFICES OF THE EXISTENCE OF THIS WARRANT IN THAT SAN FRANCISCO IS UNAWARE OF THE LOCATION OF ALL OF THESE INDIVIDUALS AND THE POSSIBILITY EXISTS ONE OR MORE MAY HAVE ESCAPED GUYANA AND BE IN THE UNITED STATES.

BT