



DISTRICT COURT OF MARYLAND FOR Anne Arundel County

Located at 251 Rowe Boulevard, Annapolis, Maryland 21401



Case No. 6A00273762

STATE OF MARYLAND

VS.

WHEELER, TODD DWIGHT

COMPLAINANT:

Officer: HOWARTH, R.M.

Agency/Subagency: OFM 10

Officer ID: 8089

920 EDGERLY ROAD

GLEN BURNIE, MD 21060

CC#:

LID:

Race: 2 Sex: M

DOB: 11/26/1985

SID:

DL#: W-460-799-157-903 MD

Ht: 5' 6"

Wt: 180

Phone(H):

Hair:

Eyes:

Phone(W):

STATEMENT OF CHARGES

UPON THE FACTS CONTAINED IN THE APPLICATION OF Officer: HOWARTH, R.M. IT IS FORMALLY CHARGED THAT WHEELER, TODD DWIGHT at the dates, times and locations specified below:

NUM	CHG/CIT	STATUTE	PENALTY	DESCRIPTION OF THE CHARGE
001	1 0720	CR 4 503 ((a)(1))	25 Y &/or \$250,000.00	DEST DEVICE MAN/POS/DIST On or About 01/02/2014 920 EDGERLY ROAD GLEN BURNIE, MD ...did knowingly manufacture and possess a destructive device. Against the Peace, Government, and Dignity of the State.
002	1 0720	CR 4 503 ((a)(1))	25 Y &/or \$250,000.00	DEST DEVICE MAN/POS/DIST On or About 01/02/2014 920 EDGERLY ROAD GLEN BURNIE, MD ...did knowingly manufacture and possess a destructive device. Against the Peace, Government, and Dignity of the State.
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007	1 0720	CR 4 503 ((a)(1))	25 Y &/or \$250,000.00	DEST DEVICE MAN/POS/DIST On or About 01/02/2014 920 EDGERLY ROAD GLEN BURNIE, MD ...did knowingly manufacture and possess a destructive device. Against the Peace, Government, and Dignity of the State.

Date : 01/13/2014 Time : 10:52 AM

Tracking No. 131002221523

Judicial Officer: _____

7050



DISTRICT COURT OF MARYLAND FOR Anne Arundel County

Located at 251 Rowe Boulevard, Annapolis, Maryland 21401


Case No. 6A00273762

STATE OF MARYLAND VS. WHEELER, TODD DWIGHT

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013	1 0725	CR 4 503 ((a)(2))	25 Y &/or \$250,000.00	POSS EXPL/INCEND W/INTENT On or About 01/02/2014 920 EDGERLY ROAD GLEN BURNIE, MD ...did possess explosive material with the intent to create a destructive device. Against the Peace, Government, and Dignity of the State.
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017	1 1314	CR 4 405 ((a))	10 Y	MACH GUN AGGRESSIVE PURPOSE

Date : 01/13/2014 Time : 10:52 AM

Tracking No. 131002221523

Judicial Officer:  7050



DISTRICT COURT OF MARYLAND FOR Anne Arundel County

Located at 251 Rowe Boulevard, Annapolis, Maryland 21401

Case No. 6A00273762

STATE OF MARYLAND VS. WHEELER, TODD DWIGHT

On or About 01/02/2014

920 EDGERLY ROAD

GLEN BURNIE, MD

...did possess or use a machine gun, to wit: an Argentina FMK , for an aggressive and offensive purpose in that the said machine gun was not registered as required by CR 4-403 of the Annotated Code of Maryland.

Against the Peace, Government, and Dignity of the State.

A handwritten signature, likely of the Judicial Officer, is written over the signature line. The signature is stylized and appears to be a cursive representation of the officer's name.

DISTRICT COURT OF MARYLAND FOR Anne Arundel County

(City, County)

LOCATED AT (COURT ADDRESS)

251 Rowe Blvd.
Annapolis, Maryland 21401DISTRICT COURT
CASE NUMBER

04273762

RELATED CASES:

COMPLAINANT

DEFENDANT

Captain R.M. Howarth

Name (Print)

2660 Riva Road

Address (Number and Street)

Annapolis, Maryland 21401

City, State, Zip Code

OFM

0010

410-222-7884

Telephone

#8089

Agency, Sub-Agency, and I.D. # (Officer Only)

Todd Dwight Wheeler Jr.

Name (Print)

920 Edgerly Road

Address (Number and Street)

Glen Burnie, Maryland, 21060

City, State, Zip Code

Telephone

CC#

DEFENDANT'S DESCRIPTION Driver's License # W-460799-157-903

Sex M Race W Ht. 5' 06" Wt. 180

Hair Eyes Complexion Other

D.O.B. 11/26/1985 ID

APPLICATION FOR STATEMENT OF CHARGES

Page 1 of 5

I, the undersigned, apply for a statement of charges and a summons or warrant which may lead to the arrest of the above named defendant because on or about January 02, 2014 at 920 Edgerly Rd., Glen Burnie, Maryland, 21060

, the above named Defendant

did manufacture and possess destructive devices, and possess explosive materials, and possess CDS, and

(Concise statement of acts showing that there is probable cause to believe that a crime has been committed and that the Defendant has committed it.)
possess CDS paraphernalia, and possess a machine gun at 920 Edgerly Road. On January 01, 2014 Anne

Arundel County Police responded to an incident involving a suicidal subject. The subject was

identified as Todd D. Wheeler Jr. Initial reports indicated that Mr. Wheeler was injured and making

suicidal statements. Anne Arundel County Police located Mr. Wheeler at a Millersville home and

(Continued on attached 4 pages) (DC/CR 1A)

I solemnly affirm under the penalties of perjury that the contents of this Application are true to the best of my knowledge, information and belief.

January 13, 2014

Date

Officer's Signature

I have read, or had read to me, and I understand the Notice on the Back of this form.

Date

Applicant's Signature

Subscribed and sworn to before me this 13 day of January, 2014

Time: 10:52 A.M. Judge/CommissionerI.D. 7050

I understand that a charging document has been issued and that I must appear for trial ☐ on at Time, ☐ when notified by the Clerk, at the Court location shown at the top of this form

Date

Applicant's Signature

☐ I have advised applicant of shielding right. ☐ Applicant declines shielding.

☐ I declined to issue a charging document because of lack of probable cause.

Date

Commissioner

I.D.

TRACKING NUMBER

DISTRICT COURT OF MARYLAND FOR Anne Arundel County

(City/County)

LOCATED AT (COURT ADDRESS)

251 Rowe Blvd.
Annapolis, Md 21401DISTRICT COURT
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST M.I.)

Wheeler Jr., Todd D.

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 2 of 5

placed him into custody for an emergency evaluation. Officers observed an injury to Mr. Wheeler's left hand that was consistent with a blast injury. Officers also noted that Mr. Wheeler had a chemical odor emitting from his person.

On Thursday, January 2, 2014 at approximately 11:10 Hours, Anne Arundel County Fire and Explosives Investigators accompanied by Anne Arundel County Police and Bureau of Alcohol, Tobacco, Firearms & Explosives personnel executed a search and seizure warrant, signed by the honorable Jonas Legum of the District Court. The warrant was executed at 920 Edgerly Road, Glen Burnie, Maryland 21061 in the Harundale Section of Anne Arundel County.

During the search of the residence investigators discovered explosive materials including but not limited to, powders, chlorates, perchlorates, nitrates, acids, canisters, chemicals, and tools, that could be used in the manufacture of explosives and components used in the manufacture of improvised explosive devices (IED).

Investigators also discovered multiple firearms and other weapons throughout the residence. The home had several hundred hypodermic needles scattered on the floors, furniture, and counters.

There were unidentified materials and devices scattered throughout the living area and indications that there may be booby-traps in the house. A determination was made after consultation with fire investigators, police, bomb squad personnel and federal agents that the search would be suspended at dark and the house guarded by fire investigators and police. The search would resume in the

morning of the next day. This determination was made because of the extreme hazards present and the need for safer daylight conditions during the search. The search resumed on January 03, 2014.

After suspending the search for the day, I proceeded to complete a Statement of Charges covering possession and manufacture of two devices that had been located, and the reckless endangerment that was placed on the surrounding homes. Mr. Wheeler was in custody after being released from Baltimore Washington Medical Center. Charges were levied against Mr. Wheeler with district court

01/13/2014
DateR. M. [Signature]
Applicant's Signature

DISTRICT COURT OF MARYLAND FOR Anne Arundel County(City County)

LOCATED AT (COURT ADDRESS)

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Annapolis, Md 21401DISTRICT COURT
CASE NUMBER

DEFENDANT'S NAME (LAST, FIRST M.I.)

Wheeler Jr., Todd D.

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 3 of 5

case number 0A00259469 for possession and manufacture of the two destructive devices and reckless endangerment.

After taking out charges on January 02, 2014 for the two initial IED's discovered, investigators continued searching the residence for an additional day and discovered numerous additional items for which I am now seeking a warrant for. The items discovered included the following:

While searching the living / dining room of the home the following explosive devices were discovered and seized: 1.) IED with white exam glove wrapped around a cardboard tube with a green fuse, 2.) IED in cardboard tube with red fuse, 3.) IED in cardboard tube with yellow cap and green fuse, 4.) IED in cardboard tube with green fuse, 5.) IED in green plastic container with red fuse, 6.) IED in cardboard tube with red fuse, 7.) IED in silver metal container with explosive filler, 8.) IED in green plastic container with red fuse, 9.) IED in a prescription bottle with explosive material, 10.) IED created from an ink pen with green fuse, 11.) IED created from an ink pen with yellow electric wire protruding from the end, 12.) IED in green plastic container with red fuse.

These destructive devices were not consistent with commercially made devices and been made from materials improvised or altered to make a destructive device. Some devices contained foreign objects that had been placed inside of the device which would create projectiles capable of seriously injuring or killing other people. Some of the devices also included explosives that if detonated could cause structural damage and serious injury or death.

While searching the interior living area of the home, explosive chemicals were also discovered and seized. These chemicals consisted of the following: 1.) a gray powder in a glass "Mason" style jar.

A flame test was conducted on this material which indicated it to be an explosive material. 2.) A gray powder in a "Mason" style jar with the word "aluminum" written on a label affixed to the jar.

A flame test was conducted on this material which indicated it to be an explosive material. 3.) A yellow powder in a "Mason" style jar with the label "PC Sulfur". A flame test was conducted on

01/13/2014
Date

R. M. [Signature]
Applicant's Signature



DISTRICT COURT OF MARYLAND FOR ... Anne Arundel County

(City/County)

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DEFENDANT'S NAME (LAST, FIRST M.I.)

Wheeler Jr., Todd D.

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 4 of 5

this material which indicated it to be an explosive material. 4.) A white powder in a "Mason" style jar. A flame test was conducted on this material which indicated it to be an explosive material. All flame testing was conducted by explosive technicians.

CDS material and paraphernalia were also located inside the home. A "Queen Bee, Honey Bee Extractor" was discovered during the search. This extractor is used for the extraction of oil from marijuana. Inside of the extractor was a green leafy plant material, suspected marijuana. There were also several hundred glassine baggies, which I associated with packaging of CDS, was discovered in the bedroom along with a small digital scale. These items were evaluated by and turned over to narcotics officers.

While searching the shed located in the rear of the residence a box was located that contained the lower receiver, barrel, grip, magazine, and other parts to what is identified as a firearm. The firearm was examined by the on scene ATF personnel and the serial number, pictures, and additional information was sent to ATF firearms personnel. The firearm was identified as an Argentina FMK sub machine gun. A function check performed by ATF personnel indicated that the weapon is believed to be fully automatic. This firearm was seized by investigators. A routine check of the Maryland gun center did not show this weapon as being registered by Todd D. Wheeler Jr. as required under CR4-403(c).

Additional chemicals and explosive precursors were also found and seized in the house, along with numerous manuals and books detailing how to make homemade explosives, create boobytraps, and modify weapons to make them fully automatic. The titles of some of the books included, *Poor Man's James Bond*, *Two Component High Explosive Mixtures*, *Full Auto Ruger Mini-14, Firearm Silencers*, *How to Build Practical Firearm Suppressors*, *Death Trap Improvised Booby Traps*, *Deadly Brew - Advanced Improvised Explosives*.

The owner and resident of the home is identified as Todd Dwight Wheeler Jr. DOB: 11/26/1985. I

01/13/2014
Date

R.M.W.

Applicant's Signature



DISTRICT COURT OF MARYLAND FORAnne Arundel County.....

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Wheeler Jr., Todd D.

APPLICATION FOR STATEMENT OF CHARGES (CONTINUED) Page 5 of 5

request a warrant be issued for the described crimes, and any other appropriate crimes.

CR4-503(a)(1) – Destructive Device Manufacture 12 counts

CR4-503(a)(1) – Destructive Device Possession 12 counts

CR4-503(a)(2) – Possession Explosive Material 4 counts

CR4-405(a) – Machine Gun Aggressive Purpose 1 count

CR5-619(c)(1) – Possession CDS Paraphernalia 3 counts

CR5-601(a)(1) – Possession Marijuana 1 count

All events occurred in Anne Arundel County.

01/13/2014
Date

R. M. [Signature]
Applicant's Signature