

ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

APR - 9 2012

CLERK, U.S. DISTRICT COURT

By _____

No. 4:12-mj-126

UNITED STATES OF AMERICA §
v. §
RYAN WALKER GRANT (1) §

CRIMINAL COMPLAINT

I, Special Agent Rebecca A. Day, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

On or about April 3, 2012, in the Northern District of Texas, defendant Ryan Walker Grant used a facility in interstate commerce with intent that the murder of two individuals be committed in violation of the laws of Texas, and promised or agreed to pay things of pecuniary value, to wit: \$20,000, as consideration for the murders, in violation of 18 U.S.C. § 1958.

1. I am a Special Agent of the Federal Bureau of Investigation. I have been a Special Agent for approximately six years. I am currently assigned to the Dallas Division, Fort Worth Resident Agency. My responsibilities include conducting investigations involving allegations of public corruption and civil rights violations. I have been the affiant on several arrest and search warrant applications, and in the course of my career with the FBI, I have participated in the execution of numerous arrests. I have personally participated in this investigation and I am thoroughly familiar with the information contained in this affidavit.

2. This affidavit is submitted for the limited purpose of showing probable cause to support this application for a criminal complaint and arrest warrant. Rather than attempt to recount each and every fact known to me or others participating in this investigation, I have set forth only those facts that I believe are sufficient to support a probable cause finding for the issuance of the requested warrant. Where conversations or statements are related herein, they are related in substance and in part only unless otherwise indicated.

3. The facts set forth below are based upon my personal knowledge, information communicated to me by other law enforcement officers and persons cooperating with this investigation, interviews personally conducted by myself as well as others, and other relevant information gathered during the investigation.

4. This investigation is a joint investigation of the FBI and the Drug Enforcement Administration (DEA). It was initiated based on information that Ryan Walker Grant was plotting a murder-for-hire.

5. Ryan Walker Grant is co-owner of Flashdancer, a sexually oriented business (SOB), located in Arlington, Texas. Flashdancer has been the subject of a nuisance lawsuit filed by the Texas Attorney General's Office and the City of Arlington. Recently a civil agreement was reached between both parties, which resulted in closure of Flashdancer for a period of one year. However, the City of Arlington is currently taking steps to revoke Grant's SOB license of Flashdancer.

6. On or about April 3, 2012, Grant sent a text message to Individual A's cell phone at approximately 12:44 a.m. stating, "Call me whn u can." Individual A, in response to Grant's text, called Grant at approximately 12:57 a.m. Grant's cell phone conversation with Individual A was recorded. Grant advised Individual A that he wanted to talk to Individual A in person about some "formal business." Grant stated, "I really need somebody to take a vacation up here to do a job from down south man." Grant gave an example that if a movie was playing in Miami then a person from Cuba would fly to Miami to watch the movie, and after watching the movie, that person would go back to Cuba and never come back to Miami. Through conducting this investigation and confidential source information, law enforcement officers have learned that Grant often speaks in code and uses the term "watch a movie" to mean have someone murdered.

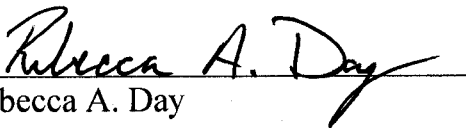
7. On April 3, 2012, at approximately 1:50 p.m., Individual A made contact with Grant at his residence in Kennedale, Texas. Inside his residence, Grant handed Individual A a piece of paper containing pictures and contact information of two individuals that Grant wanted killed. Grant identified the individuals, both associated with the City of Arlington and involved in the nuisance action and revocation of Grant's SOB license. Grant was angry at these individuals because he felt that they were costing him money by attempting to stop Grant from re-opening his club, Flashdancer. In Grant's conversation with Individual A, Grant stated, "They just jacked me for a year of business and they're trying to jack me indefinitely, when we had a deal, and they just reneged on it." Grant also stated that he would lose \$800,000 a year if he were prohibited from operating Flashdancer.

8. Grant requested "wetbacks" from Mexico to come to the Dallas area and murder the two intended victims. Grant offered to pay \$10,000 per murder victim, for a total of \$20,000. He agreed to pay upon completion of the murders. Grant advised Individual A, "I can't just call up my dude and say go hit them, this is too high profile." Grant was afraid he would get "pinched" if his "hitter" were caught. Grant wanted "wetbacks" to handle the murders because they could go back to Mexico after the murders were completed.

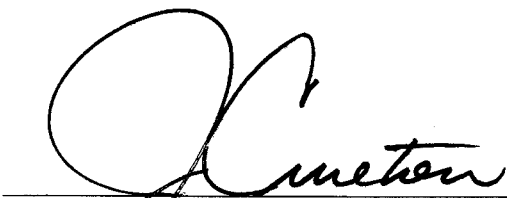
9. Grant and Individual A spoke, via cell phones, on April 5 and 6, 2012. During these conversations, Grant essentially directed Individual A not to proceed with the murders until they could meet to discuss the matter further.

10. Individual A met with Grant at Grant's residence on April 9, 2012. Grant confirmed that he wanted one of the two above-mentioned individuals killed. Individual A had informed Grant that individuals were awaiting Grant's confirmation to carry out the murders. Grant stated that he would use his child as an alibi. Grant also, during the meeting, directed Individual A to lift his shirt. Grant wanted to ensure that Individual A was not wearing a recording device.

Based on the above-described facts, I respectfully submit there is probable cause to believe that Grant has violated 18 U.S.C. § 1958. Accordingly, I respectfully request a warrant be issued for the arrest of Grant.


Rebecca A. Day
Special Agent
Federal Bureau of Investigation

Sworn to and subscribed before me on this 9th day of April 2012.


JEFFREY L. CURETON
United States Magistrate Judge